



THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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**SENSITIVE**

**MEMORANDUM**

September 10, 2007

TO: The Commission

THROUGH: Patrina M. Clark *mlc*  
Staff Director

FROM: John D. Gibson *JDG*  
Chief Compliance Officer

Deborah Ruth Kant *DRK*  
Director, ADR Office

BY: Lynn M. Fraser *LMF*  
Assistant Director, ADR Office

SUBJECT: ADR 401 Growth and Prosperity PAC and Joey Dobbs, Treasurer  
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Appointment of compliance specialist; all reports reviewed by the compliance specialist and external financial consultants; develop revised written financial procedures; and a civil penalty of \$2,000 (amount in dispute for two reports \$173,622.28).

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 401 (RR 07L-18)**. This case was received on May 31, 2007, and was assigned to the ADR Office on June 20, 2007.

**SUMMARY:** The Reports Analysis Division referred Respondents for failing to make complete disclosure of financial activity on their 2006 August Monthly Report and their 2006 October Monthly Report. Respondents filed their original 2006 August Monthly Report on August 19, 2006, and subsequently filed three (3) amended 2006 August Monthly Reports disclosing an aggregate of \$65,717.28 in additional disbursements. Respondents filed their original 2006 October Monthly Report on October 20, 2006 and

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filed four (4) amended 2006 October Monthly Reports, disclosing an aggregate of \$107,905 in additional disbursements. Respondents acknowledge omissions in reporting disbursements, but contend that the individual responsible for the errors has been replaced by a financial specialist experienced with compliance with the FECA.

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of the Growth and Prosperity Political Action Committee and Joey Dobbs, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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