



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

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**SENSITIVE**

**MEMORANDUM**

March 13, 2009

TO: The Commission

THROUGH: Joseph F. Stoltz *JFS*  
Acting Staff Director

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

Lynn M. Fraser *LMF*  
Acting Director, ADR Office

SUBJECT: ADR 412 Larry Kissell for Congress and Walter Ingram Butch Jenkins III,  
Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop an operations manual; conduct a complete reconciliation of all Committee financial records every month for one year from the effective date of the agreement; and pay a civil penalty of \$1,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 412 (RAD 07L-29). This case was activated by the ADR Office on September 18, 2007.

**SUMMARY:** The Reports Analysis Division (RAD) referred Respondents for failing to disclose all financial activity on their 2006 30 Day Post-General Report. Respondents filed their original 2006 30 Day Post-General Report on December 7, 2006. Respondents then filed an amended 2006 30 Day Post-General Report on January 31, 2007 that disclosed additional receipts of \$85,663.70, and additional disbursements of \$85,534.53.

Respondents acknowledge some reporting errors or omissions during their first campaign, but took steps to revise their procedures and correct the record.

Recommendation to Approve  
Settlement Agreement  
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**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Larry Kissell for Congress and Walter Ingram Butch Jenkins III, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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