



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

March 4, 2008

**MEMORANDUM**

TO: The Commission

THROUGH: Patrina M. Clark *pm*  
Staff Director

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

Deborah Ruth Kant *DRK*  
Director, ADR Office

SUBJECT: ADR 415 Kilroy for Congress, and Sandford A. Meizlish, Treasurer,  
Recommendation to Approve Settlement Agreement

**RESOLUTION TERMS:** Issuance of Policy on Internal Controls and submission of the Policy to the Commission; issuance a compliance manual; and civil penalty of \$2900 (amount in dispute \$87,455.17)

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 415 (RAD 07L-32). This case was received by the ADR Office on September 14, 2007, and was assigned to the ADR Office on September 28, 2007.

**SUMMARY:** Treasurers of political committees are required to report all financial activity, including all receipts. 2 U.S.C. §§ 434(a), 434(b)(2), 11 C.F.R. § 104.3(a). In this case, Respondents (or "the Committee") failed to disclose \$87,455.17 in additional receipts on its 2006 30 Day Post-General Report (a 26.9% increase from the original report). The Committee filed the original 2006 30 Day Post-General Report on December 7, 2006, and filed five amended reports.<sup>1</sup> In an electronic submission to RAD on March 24, 2007, the Committee explained that the increased receipts resulted from an internal miscommunication relating to transmitted electronic files of contributions received through Emily's list.

<sup>1</sup> The amended reports were filed on January 4, 2007, January 31, 2007, February 28, 2007, March 27, 2007, and April 14, 2007.

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**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Kilroy for Congress for Congress, and Sanford A. Meizlish, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.