



FEDERAL ELECTION COMMISSION
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2008 MAR 26 A 10: 24

MEMORANDUM

SENSITIVE

March 26, 2008

TO: The Commission

THROUGH: Patrina M. Clark *gta*
Staff Director

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

Deborah Ruth Kant *DRK*
Director, ADR Office

SUBJECT: ADR 430 United Food & Commercial Workers International, Union Active Ballot Club and Anthony M. Perrone, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Purchase of new reporting software; audit certifications; internal controls certification; and civil penalty of \$1,500 (amount in dispute \$100,973.92)

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 430 (RR 07L-45)**. This case was received by the ADR Office on October 26, 2007, and was assigned to the ADR Office on November 26, 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 \$100,973.92 in receipts in its 2006 Year End Report., (a 24.3% percent increase). The Committee filed the report on January 30, and filed the amended reporting disclosing the additional receipts on March 13, 2007. In response to an RFAL, the Committee filed an electronic submission explaining that the contributions were received in the Committee's lock boxes and deposited in its bank account in December. However, the Committee's reporting system did not recognize these receipts as received in December but rather as received in January. The Committee noted that its accounting system did have the receipts properly posted for December.

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RECOMMENDATIONS:

1. Approve the attached settlement agreement of United Food & Commercial Workers International, Union Active Ballot Club and Anthony M Perrone, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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