



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

November 13, 2007

TO: The Commission

THROUGH: Patrina M. Clark *JMC*
Staff Director

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

Deborah Ruth Kant *DRK*
Director, ADR Office

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

SUBJECT: ADR 431 Pete King for Congress and Anne Rosenfeld, Treasurer,
Recommendation to Assign¹

ADR Case: ADR 431

Source No. RAD 07L-49

Respondents:
Pete King for Congress Committee
Anne Rosenfeld, Treasurer

Respondents' Rep.:
Anne Rosenfeld

Complainant: RAD

Committee Name: Pete King for Congress Committee

Date Referral Filed: 11/2/07

Committee Type: Authorized

Date Forwarded to ADRO: 11/2/07

District #/or State: NY 3rd CD

Election Cycle: 2006

Election - Won/Lost: Won General

¹ The Office of General Counsel reviewed the ADR Memorandum, and concurs in the description of the case

Issues:

- Mathematical Discrepancies 2 U.S.C. § 434(b), 11 C.F.R. § 104.3
- Itemization contributions § 434(b)(3)(A), 11 C.F.R. §§ 100.12, 104.3(a)(4)
- Gross Receipts Schedule² 11 C.F.R. § 104.19

Summary and Analysis of Case: Treasurers of political committees are required to report all financial activity. The Reports Analysis Division (RAD) referred Pete King for Congress Committee and Anne Rosenfeld, Treasurer (Respondents or the Committee) for a series of errors beginning with the 2005 July Quarterly Report and continuing through the 2006 30 Day Post General Report. While most of the errors involved significant mathematical discrepancies, which Respondents failed to correct, the reports also included a failure to file accurate schedules of contributions, a failure to file required 48-Hour Notices, and a failure to provide identification on more than twenty percent (20%) of the contributors on a report. The Committee is the principal campaign committee for Peter T. King, a successful candidate in the 2006 General Election.

RECOMMENDATION:

1. **Assign ADR 431/RAD 07L-49 to the ADR Office.**

² Schedule of gross receipts (Form 3Z-1) is required to be filed by authorized committees in non-election years.