



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION
JUL 14 2008

SENSITIVE

MEMORANDUM

July 14, 2008

TO: The Commission

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

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

SUBJECT: ADR 431 Pete King for Congress Committee and Anne Rosenfield,
Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Work with Commission staff to correct mathematical errors and amend all necessary reports, certify that Committee representative attended a FEC conference, and pay a civil penalty of \$4,500

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 431 (RAD 07L-49). This case was received by the ADR Office on November 2, 2007, and was activated by the ADR Office on November 16, 2007.

SUMMARY: A committee may be referred for audit under the Act if the cumulative nature of the reporting errors reveals the committee is not in substantial compliance with the law. 2 U.S.C. § 438(b). The Reports Analysis Division referred the Respondents (or “the Committee”) for cumulative errors during the 2006 election cycle. 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. Respondents contend they resolved many of the software difficulties leading to errors, and that reports were consistently updated with contributor identification information as it was received.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Pete King for Congress Committee and Anne Rosenfeld, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.