



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

January 29, 2008

TO: The Commission

THROUGH: Patrina M. Clark
Staff Director

FROM: John D. Gibson
Chief Compliance Officer

Deborah Ruth Kant
Director, ADR Office

BY: Lynn M. Fraser
Assistant Director, ADR Office

SUBJECT: ADR 443 21st Century Democrats and Bill Combs, Treasurer,
Recommendation to Assign¹

ADR Case: ADR 443

Source No. RAD 08L-03

Respondents:
21st Century Democrats
Bill Combs, Treasurer

Respondents' Rep.:
Bill Combs

Complainant: RAD

Committee Name: 21st Century Democrats

Date Referral Filed: 1/22/08

Committee Type: Unauthorized

Election Cycle: 2006

Summary and Analysis of Case: Treasurers of political committees are required to report all financial activity. The Reports Analysis Division referred the 21st Century Democrats and Bill

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

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Combs, Treasurer (Respondents or the Committee) for a series of errors during the 2005-2006 election cycle. While many of the errors involved mathematical discrepancies, Respondents' reports also included: the disclosure of excessive contributions and/or otherwise prohibited contributions or transfers; a failure to provide accurate or appropriate supporting schedules; a failure to properly itemize contributions from individuals; a failure to properly allocate between federal and non-federal activity; and a failure to clarify public communication expenses and possible candidate fundraising expenses.

RECOMMENDATION:

- 1. Assign ADR 443/RAD 08L-03 to the ADR Office.**

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