



FEDERAL ELECTION COMMISSION  
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**MEMORANDUM**

March 3, 2008

**SENSITIVE**

TO: The Commission

THROUGH: Patrina M. Clark *mc*  
Staff Director

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

Deborah Ruth Kant *DRK*  
Director, ADR Office

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

SUBJECT: ADR 449 Republican Leadership Council Federal PAC and Ronald R. Gravino,  
Treasurer, Informational Memo on Assignment

The Reports Analysis Division referred RAD 08L-08 to the ADR Office and the ADR Office has assigned the matter ADR 449. We have included a summary and discussion of the referral for your information. We anticipate initiating ADR 449 on March 6, 2008. Please contact Lynn Fraser, if you have any questions or concerns before then. A copy of the referral is in the voting ballots folder.

**Summary and Analysis of Case:** The Reports Analysis Division referred the Republican Leadership Council Federal PAC and Ronald R. Gravino, Treasurer (Respondents or the Committee) for a series of errors during the 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, a failure to provide supporting schedules, and a failure to itemize contributions and transfers to political committees, a failure to properly itemize disbursements, as well as a failure to clarify public communication expenses and possible candidate fundraising expenses.

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