



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

October 29, 2008

TO: The Commission

THROUGH: Joseph E. Stoltz *JES*
Acting Staff Director

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

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

SUBJECT: ADR 449 Republican Leadership Council Federal PAC and Ronald R. Gravino, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop written procedures for Requests for Additional Information (RFAs), train Committee staff on adequate itemization for reporting purposes, and furnish RAD with the Committee's "best efforts" procedures.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 449 (RAD 08L-08). This case was received by the ADR Office on January 31, 2008, and was activated by the ADR Office on March 3, 2008.

SUMMARY: The Reports Analysis Division referred the Republican Leadership Council Federal PAC and Ronald R. Gravino, Treasurer, (Respondents or the Committee) for cumulative errors during the 2005-2006 election cycle. Some of the errors involved mathematical discrepancies, missing schedules, and failures to itemize contributions. The Committee, in response, explained that some of the errors or omissions occurred due to inexperienced staff.

RAD referred this case to ADR pursuant to the 2007-2008 Review and Referral Procedures, which provides for such referrals when committees are audit eligible but will not be audited due to resources. 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).

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RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Republican Leadership Council Federal PAC and Ronald R. Gravino, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.