



FEDERAL ELECTION COMMISSION
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MEMORANDUM

March 7, 2008

TO: The Commission
THROUGH: Patrina M. Clark *PM*
Staff Director
FROM: John D. Gibson *JDG*
Chief Compliance Officer
Deborah Ruth Kant *DRK*
Director, ADR Office

SENSITIVE

SUBJECT: ADR 455 Council For A Livable World Candidate Fund and John D. Isaacs, Treasurer, Informational Memo on Assignment

The Office of General Counsel has referred RR 08L-10 to the ADR Office and the ADR Office has assigned the matter ADR 455. We have included a summary and discussion of the referral for your information. We anticipate initiating ADR 455 on March --, 2008. Please contact Deborah Ruth Kant if you have any questions or concerns before then. Copies of the referral and the EPS Report are in the voting ballots folder.

Summary of Case: Every person who receives a contribution for an authorized committee shall, no later than ten (10) days after receiving such contribution, forward the contribution to the treasurer of the committee. 2 U.S.C. § 432(b)(1), 11 C.F.R. §§ 102.8(a) and (c), 110.6(c)(1)(iii). In this case, the Reports Analysis Division Counsel referred Council For A Livable World Candidate Fund and John D. Isaacs, Treasurer (Respondents or the Committee) for disclosing disbursements of undeposited earmarked contributions received for authorized committees more than ten days after receipt on its May Monthly, July Monthly and 30 Day Post-General Reports. The disbursements totaled \$78,041 (44% of the calendar year-to-date totals).

In response to Requests For Additional Information involving the earmarked contributions in these reports, the Committee explained that it had implemented a new system for contributions processing and had experienced problems in the conversion. The Committee further explained that the new system did not meet the Committee's expectations, given the intermittent problems. As a result, the Committee stated it had decided to revert to its prior system for processing contributions. The Committee noted

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that it had an excellent reputation for processing and forwarding earmarked contributions for the last thirty years.

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