



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

July 1, 2008

TO: The Commission

THROUGH: Patrina M. Clark *pmc*  
Staff Director

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

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

SUBJECT: ADR 464 Jim King for Congress and Leo D. Dougherty, Treasurer,  
Recommendation to Dismiss

The Office of General Counsel (OGC) referred MUR 6007, and the ADR Office designated the matter as ADR 464. We have included a summary and discussion of the matter for your information. Copies of the complaint and response, as well as the FPS report, are in the voting ballots folder.

**Summary and Analysis of Case:** This matter should be dismissed because the clerical error in the summary of the 2008 April Quarterly Report has been corrected by the filing of an amended 2008 April Quarterly Report, and there is no evidence to support the allegation of inadequate itemization of contributions. OGC referred Jim King for Congress and Leo D. Dougherty, Treasurer (Respondents or the Committee) based on a complaint filed by Angie Langley. Complainant alleges that Respondents failed to adequately itemize contributions, and the 2008 April Quarterly Report has an obvious math error in the summary page. The complaint further alleges that it is not believable that Respondents received so many small contributions that did not require itemization.

The Committee acknowledges that there was a clerical error that resulted in a math discrepancy in its 2008 April Quarterly Report, but Respondents filed an amended report to correct the record. In addition, Respondents contend the allegation of a failure to adequately itemize contributions was not accurate, and affirm the accuracy of the number of small contributions not requiring itemization.

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The Committee acknowledges that there was a clerical error that resulted in a math discrepancy in its 2008 April Quarterly Report, but Respondents filed an amended report to correct the record. In addition, Respondents contend the allegation of a failure to adequately itemize contributions was not accurate, and affirm the accuracy of the number of small contributions not requiring itemization.

**RECOMMENDATION:**

- 1. Dismiss ADR 464 (MUR 6007), and close the file.**
- 2. Approve the appropriate letters.**