



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SEP 17 4: 16

SENSITIVE

MEMORANDUM

September 17, 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 469 Pro-Life Campaign Committee and Chris Gersten, Treasurer,
Informational Memo on Assignment

The Reports Analysis Division referred RAD 08L-32 for processing, and the ADR Office designated the referral as ADR 469. We have included a summary and discussion of the referral for your information. We anticipate initiating ADR 469 on September 22, 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 of Case: The Reports Analysis Division referred the Pro-Life Campaign and Chris Gersten, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2004 30 Day Post-General Report, as well as their 2004 Year End Report. On February 13, 2008, Respondents filed an amended 2004 30 Day Post-General Report that disclosed \$216,450.05 in additional receipts, and \$218,233.22 in additional disbursements. Also on February 13, 2008, Respondents filed an amended 2004 Year End Report that disclosed additional receipts which, in the aggregate, total \$129,689.40, and additional disbursements of \$138,048.79.

In response to the Requests for Additional Information sent to the Committee, Respondents stated that data received from its vendor, Hope Call Center, and its compliance service, Aristotle, was confusing and inadequate. Although Respondents did not realize it at the time, the inaccurate data resulted in reports being filed with the Commission that did not reflect all receipts and disbursements, thus amended reports were filed.

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RECOMMENDATIONS:

1. Approve the attached settlement agreement Pro-Life Campaign Committee and Chris Gersten, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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