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MEMORANDUM

December 10, 2008

TO: The Commission

THROUGH: Joseph F. Stoltz *JFS*
Acting Staff Director

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

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

SUBJECT: ADR 476 Veterans for Victory PAC and Russel McCurdy, Treasurer,
Informational Memo on Assignment

The Reports Analysis Division referred RAD 08L-39 for processing, and the ADR Office designated the referral ADR 476. We have included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 476 on December 16, 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 Veterans for Victory PAC and Russel McCurdy, Treasurer (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2006 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's errors included, among other things: failures to itemize contributions, mathematical discrepancies, failures to clarify categories of administrative expenses, failures to clarify public communication expenses, and failures to clarify possible candidate fundraising expenses.