



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2009 JUL 15 P 4:38

**SENSITIVE**

**MEMORANDUM**

July 15, 2009

TO: The Commission

THROUGH: Robert A. Hickey *[Signature]*  
Staff Director

FROM: John D. Gibson *[Signature]*  
Chief Compliance Officer

Lynn M. Fraser *[Signature]*  
Acting Director, ADR Office

SUBJECT: ADR 476 Veterans For Victory PAC and Russel McCurdy, Treasurer,  
Recommendation to Approve Settlement Agreement

**RESOLUTION TERMS:** Develop and maintain a receipt, tracking and response process for Requests for Additional Information received from the Commission; and pay a civil penalty of \$5,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 476 (RAD 08L-39). This case was received by the ADR Office on December 5, 2008.

**SUMMARY:** The Reports Analysis Division referred the Veterans For Victory PAC and Russel McCurdy, Treasurer (Respondents or the Committee) for cumulative errors during the 2006 election cycle. 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.

Respondents contend that Committee staff was comprised of volunteers and inexperienced with the FECA.

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**RECOMMENDATIONS:**

Approve the attached settlement agreement of Veterans For Victory PAC and Russel McCurdy, Treasurer.

2. Approve the appropriate letters.
3. Close the file on this matter.

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