



FEDERAL ELECTION COMMISSION
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MEMORANDUM

January 13, 2009

TO: The Commission

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

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

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

SUBJECT: ADR 481 Christine Jennings for Congress and Susan Flynn, Treasurer,
Informational Memo on Assignment

The Audit Division (Audit) referred Audit 07-16 for processing, and the ADR Office designated the referral as ADR 481. We have included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 481 on January 21, 2009. 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: Audit referred Christine Jennings for Congress and Susan Flynn, Treasurer (Respondents or the Committee) as a result of three findings following an audit of Respondents' 2006 election cycle financial records. One finding identified 111 contributions from individuals that exceeded the limitations by \$95,897. Respondents provided copies of letters sent to contributors that were eligible for presumptive redesignation and/or reattribution dealing with \$93,797, and copies of negotiated refund checks for the remaining \$2,100.

In another finding, Audit determined that Respondents failed to file 48-Hour notices for 27 contributions totaling \$43,700 received prior to the primary and general elections. In response to the interim audit, the Committee acknowledged that it may have failed to file all contributions subject to the 48-Hour notice requirement, but put procedures in place so that the omission does not reoccur.

In the final finding, Audit found that Respondents failed to itemize 30 contributions from 24 political committees totaling \$43,310 on its itemizations of receipts. As a result of the interim audit, Respondents filed amended reports which materially disclosed necessary information on these contributions.