



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20461

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2009 AUG -6 A 11: 32

**SENSITIVE**

**MEMORANDUM**

August 6, 2009

TO: The Commission

THROUGH: Robert A. Hickey *RF for R. H.*  
Staff Director

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

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

SUBJECT: ADR 492 Committee to Re-Elect Ed Towns and Albert C. Wiltshire,  
Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop an internal controls policy pursuant to FEC  
guidelines; appoint a compliance specialist; develop a  
compliance manual for Committee reference; and pay a civil  
penalty of \$2,000 (amount in dispute \$111,705).

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to  
ADR 492 (RAD 09L-14). The ADR Office received this referral on April 24, 2009.

**SUMMARY:** The Reports Analysis Division (RAD) referred the Committee to  
Re-Elect Ed Towns and Albert C. Wiltshire, Treasurer, (Respondents or the  
Committee) for failing to disclose all financial activity on their 2008 12 Day Pre-  
Primary Report. Respondents filed their original 2008 12 Day Pre-Primary Report  
on August 28, 2008. On December 4, 2008, the Committee filed an amended 2008  
12 Day Pre-Primary Report that disclosed additional receipts totaling \$111,705.03.

Respondents contend that the amended report resulted from an inadvertent  
omission at a very busy time. Respondents assert that changes were made to the  
Committee's financial procedures to ensure future compliance.

Recommendation to Approve  
Settlement Agreement  
ADR 492 (RAD 09L-14)

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**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of the Committee to Re-Elect Ed Towns and Albert C. Wiltshire, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.