



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2009 DEC 18 A 11:44

**SENSITIVE**

MEMORANDUM

December 18, 2009

TO: The Commission

THROUGH: Alec Palmer *[Signature]*  
Acting Staff Director

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

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

SUBJECT: ADR496 The Doctors' Company Federal PAC (DOCPAC) and Leona Egeland Siadek, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Complete and certify an internal audit of all financial records and reports to the Commission from 2004 to June 15, 2009; amend all reports necessary to accurately reflect the financial activity of the Committee from 2004 to the present time; and pay a civil penalty of \$1,500 (based on negative cash balances of \$37,733.36 and \$30,531.96).

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 496 (RAD 09L-20). The ADR Office received this referral on June 9, 2009.

**SUMMARY:** In this case, the Reports Analysis Division (RAD) referred The Doctors' Company Federal PAC (DOCPAC) and Leona Egeland Siadek, Treasurer, (Respondents) for failing to disclose all financial activity on their 2008 12 Day Pre-General Report and their 2008 30 Day Post-General Report. Specifically, Respondents 2008 12 Day Pre-General Report and their 2008 30 Day Post-General Report reflected negative cash balances of \$37,733.36 and \$30,531.96 respectively, in violation of the FECA.

Respondents acknowledge that some reports reflected a negative cash balance, but contend that their bank accounts never reflected a negative balance. Respondents assert they worked with Commission staff to determine how the error was occurring.

Recommendation to Approve  
Settlement Agreement  
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**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of The Doctors' Company Federal PAC (DOCPAC) and Leona Egeland Siadek, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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