



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SECRETARIAT
2009 SEP -2 P 3:40

SENSITIVE

MEMORANDUM

September 2, 2009

TO: The Commission

THROUGH: Robert A. Hickey *RAH*
Staff Director

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

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

SUBJECT: ADR 501 Wicker Mississippi Victory Committee and Arnie Hederman,
Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Send a representative to an FEC conference; and pay a civil
penalty of \$4,000 (\$385,727)

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 501 (RAD 09L-24). The ADR Office received this referral on June 30, 2009.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred the Wicker Mississippi Victory Committee and Arnie Hederman, Treasurer (Respondents or the Committee), following a review of Respondents amended 2008 Quarterly and 2008 12 Day Pre-General Reports filed on December 4, 2008, for a failure to disclose all financial activity. The amended 2008 Quarterly Report disclosed additional receipts of \$203,247, and the amended 2008 12 Day Pre-General Report disclosed additional disbursements of \$182,480. Respondents contend that they discovered the under-reporting due to a clerical error made in July and August 2008, and filed the amended reports to correct the record.

Recommendation to Approve
Settlement Agreement
ADR501 (RAD 09L-24)
Page 1

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RECOMMENDATIONS:

1. Approve the attached settlement agreement of Wicker Mississippi Victory Committee and Arnie Hederman, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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