



FEDERAL ELECTION COMMISSION
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MEMORANDUM

October 27, 2009

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *AP*
Acting Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 504 Washington State Democratic Central Committee and Habib M. Habib, Treasurer, Recommendation to Dismiss¹

The Reports Analysis Division (RAD) referred RAD 09L-26, and the ADR Office designated the matter as ADR 504. We have included a summary and discussion of the matter for your information.

Summary and Analysis of Case: RAD referred the Washington State Democratic Central Committee and Habib M. Habib, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2008 12 Day Pre-General Report. This referral was based on an amended 2008 12 Day Pre-General Report filed on December 18, 2008 that disclosed an additional debt of \$73,266.

Respondents contend they filed the initial amended report as they believed they inadvertently omitted the debt. A further review of their reports, and the underlying invoice, demonstrated that the *amended* 2008 12 Day Pre-General Report was in error, and not the original report. The debt had not been incurred during the October 1, 2008 through October 15, 2008 reporting period for the 2008 12 Day Pre-General Report. The disbursement was appropriately disclosed on the 2008 30 Day Post-General Report. The Committee filed another amended report on October 21, 2009 to correct the record.

RECOMMENDATION:

1. Dismiss ADR 504 (RAD 09L-26), and close the file.
2. Approve the appropriate letters.

¹ The Office of General Counsel concurs in the description of this matter.

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