



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2009 SEP 24 P 3 16

SENSITIVE

MEMORANDUM

September 24, 2009

TO: The Commission

THROUGH: Robert A. Hickey *A FoI R H*
Staff Director

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

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

SUBJECT: ADR 506 Friends of Phil Steck and Cornelius D. Murray, Treasurer
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Work with Commission staff to terminate the Committee;
and pay a civil penalty of \$2,000 (amount in dispute
\$187,693)

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 506 (RAD 09L-28). The ADR Office received this referral on July 27, 2009.

SUMMARY: In this case, the Reports Analysis Division referred Friends of Phil Steck
and Cornelius D. Murray, Treasurer (Respondents or the Committee) for a failure to
disclose all financial activity on their 2008 12 Day Pre-Primary Report and their 2008
October Quarterly Report. The Committee filed several amended 2008 12 Day Pre-Primary
Reports beginning on October 25, 2008, which resulted in additional disbursements of
\$94,987.16. The Committee filed several amended 2008 October Quarterly Reports
beginning on December 29, 2008, which resulted in additional disbursements of \$92,706.

Respondents acknowledge inadvertent omissions on the two reports which resulted from
three wire transfers. These wire transfers were for media buys and were inadvertently not
recorded in the campaign's check book.

29190281970

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Friends of Phil Steck and Cornelius D. Murray, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

29190281971