



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

November 2, 2009

TO: The Commission

THROUGH: Alec Palmer  
Acting Staff Director *AP*

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

Lynn M. Fraser  
Director, ADR Office *LMF*

SUBJECT: ADR 511 Christopher Shays for Congress and Christopher Shays, Treasurer  
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Work with Commission staff to terminate the Committee's reporting obligations.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 511 (Pre-MUR 483). The ADR Office received this referral on August 26, 2009.

**SUMMARY:** This case originated when Christopher Shays for Congress and Christopher Shays, Treasurer (Committee) filed a *sua sponte* submission alleging that a former Committee official apparently misappropriated Committee funds and caused inaccurate reports to be filed with the Commission. The Committee also alleges that while the exact amount of funds misappropriated remains unknown at this time, it appears to be in excess of \$200,000.

Recommendation to Approve  
Settlement Agreement  
ADR 511 (Pre-MUR 483)  
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