



FEDERAL ELECTION COMMISSION  
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**SENSITIVE**

**MEMORANDUM**

January 22, 2010

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 535 Republican National Committee and Randall Pullen, Treasurer,  
Informational Memo on Assignment

The Reports Analysis Division referred RAD 10L-02 for processing on January 15, 2010, and the ADR Office designated the referral ADR 535. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 535 on January 26, 2010. Please contact Lynn Fraser if you have any questions or concerns before then.

**Summary of Case:** The Reports Analysis Division (RAD) referred the Republican National Committee and Randall Pullen, Treasurer (Respondents or the Committee), in the first part of this referral, for a series of reporting errors and other FECA violations during the 2008 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's errors included, among other things: prohibited or otherwise impermissible contributions; math discrepancies; failing to provide supporting schedules; independent expenditure issues; and coordinated expenditure issues.

RAD also referred the Committee for receiving excessive contributions from thirty-four (34) individuals and three (3) multicandidate political committees that were not refunded, reattributed or transferred out within sixty (60) days of the date of receipt. Further, the Committee received prohibited receipts from twelve

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(12) corporations which were not refunded or transferred out within thirty (30) days of the date of receipt. The excessive and prohibited contributions not refunded, reattributed or transferred to a non-federal account within the applicable timeframes total \$309,540.00 as disclosed on the 2008 June Monthly, October Monthly, 12 Day Pre-General and 30 Day Post-General Reports.

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