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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

May 17, 2010

TO: The Commission

THROUGH: Alec Palmer *AP*
Acting Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Lynn M. Fraser *LMF*
Director, ADR Office

BY: Krista J. Roche *KJR*
Assistant Director, ADR Office

SUBJECT: ADR 542 Seafarers Political Activity Donation – Seafarers International Union of N.A. – AGLIWD/NMU and Suzanne L. Plourde, Treasurer, Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 10L-05 for processing on May 12, 2010, and the ADR Office designated the referral ADR 542. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 542 on May 27, 2010. Please contact Krista Roche (x1661) if you have any questions or concerns before then.

Summary of Case: RAD referred Seafarers Political Activity Donation – Seafarers International Union of N.A. – AGLIWD/NMU and Suzanne L. Plourde, Treasurer (Respondents or the Committee) for receiving \$123,900.00 from its connected organization for reimbursement of administrative expenses more than thirty (30) days after the initial disbursement was made. The Committee subsequently refunded the apparently impermissible reimbursement one hundred and thirty-nine (139) days after it was received, as disclosed on its 2009 September Monthly Report. Respondent contends that the Treasurer at the time of the initial apparently impermissible reimbursement was on medical leave and the subsequently appointed Treasurer was unaware of the pending RFAI.

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