



Federal Election Commission
Washington, DC 20463

May 27, 2014

James Lamb, Esq.
Sandler, Reiff, Young & Lamb, PC
1025 Vermont Avenue, N.W., Suite 300
Washington, DC 20005

Re: ADR698 (P-MUR 524)

Dear Mr. Lamb:

On August 12, 2011 the Federal Election Commission ("FEC" or "Commission") received the sua sponte submission on behalf of the Official 12* Dist Dem Party alleging certain violations of the Federal Election Campaign Act of 1971, as amended.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and take no further action against the Respondents, the Official 12* Dist Dem Party and James Jackson, Treasurer. In its memorandum to the Commission, dated March 6, 2014, this office stated:

Summary: Summary of Matter: The Official 12th Dist Dem Party and James Jackson, current Treasurer (Respondents or the Committee) filed a *sua sponte* submission on August 12, 2011 informing the Commission that the former Treasurer, Debra Doherty, made six unauthorized withdrawals totaling \$14,500 between January 15, 2010 and January 24, 2011, and also failed to file two reports in 2010.

This matter should be dismissed based on these facts: the Committee had internal controls which revealed the unauthorized transactions; the former Treasurer was removed from her position; all the funds taken without authorization have been repaid to the Committee; all incorrect or missing reports were filed to correct the record; and the Committee enhanced its internal controls to further protect its financial integrity.

The Committee contends that in early 2011, the Committee learned that the former Treasurer did not file the 2010 30 Day Post-General Report or the 2010 Year-End Report. In February 2011, the former Treasurer was removed from her position by the Committee. It took several weeks and repeated attempts before the former Treasurer returned the Committee's check book, bank records, and other financial documents. Respondents then conducted a thorough reconciliation of these

financial records and the reports filed with the Commission. Respondents contend that in this internal audit it was discovered that unauthorized withdrawals totaling \$14,500 had been made in the form of checks payable to cash and signed only by the former treasurer contrary to the Committee's pre-existing policy that required two officer signatures for each committee check.

Accordingly, the Commission closed its file in this matter on May 20, 2014.

The FEC is obligated by federal regulations to make a finding to terminate its proceedings public, as well as the basis therefore. 11 C.F.R. § 111.20(b). In addition, the Commission will also place on the record copies of the complaint, correspondence exchanged between Respondent(s) and the Commission, and reports prepared for the Commission by this office to assist in its consideration of this matter. Accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

If you have any questions regarding this matter please be in touch. My telephone number is 202-694-1665.

Sincerely,

Lynn M. Fraser, Director
Alternative Dispute Resolution Office