

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:

Geoff Davis for Congress and
Joe Green, as treasurer¹

MUR 5335R

SENSITIVE

GENERAL COUNSEL'S REPORT # 3

I. ACTIONS RECOMMENDED

Accept the attached conciliation agreement with Geoff Davis for Congress and Joe Green, as treasurer and close the file as it pertains to them

II. BACKGROUND AND DISCUSSION

This matter involves campaign contributions made on behalf of minor children. On February 12, 2004, the Commission found reason to believe that Geoff Davis for Congress and Joe Green, as treasurer ("the Committee"), violated 2 U.S.C. § 434(b)(3)(A).² At the Committee's request, on November 9, 2004, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe

¹ In its original Statement of Organization, the Committee was named "Geoff Davis 2002". The Committee originally designated its treasurer as Jody L. Green. On January 25, 2003, the Committee filed an amended Statement of Organization changing its name to "Geoff Davis for Congress" and its treasurer to Joe Green (a/k/a Jody Green). However, some of the Committee's disclosure reports state its name as "Davis, Geoffrey C." For purposes of clarity, hereinafter this Office refers to the Committee as "Geoff Davis for Congress" or "the Committee."

² The events that are the subject of this complaint occurred prior to November 6, 2002, the effective date of the Bipartisan Campaign Reform Act of 2002 ("BCRA"), Pub. L. 107-155, 116 Stat. 81 (2002). Therefore, unless noted to the contrary, all references to statutes and regulations in this report pertain to those that were in effect prior to the implementation of BCRA.

Based on the foregoing, this Office recommends that the Commission accept the attached conciliation agreement and close the file as to Geoff Davis for Congress and Joe Greene, as treasurer.

III. RECOMMENDATIONS

1. Accept the attached conciliation agreement as signed by Richard L. Robinson, counsel for Geoff Davis for Congress and Joe Greene, treasurer.
2. Approve the appropriate the letters.
3. Close the file as to Geoff Davis for Congress and Joe Greene, treasurer.

Lawrence H. Norton
General Counsel

12/3/04
Date

BY: Rhonda J. Vosdingh
Rhonda J. Vosdingh
Associate General Counsel
for Enforcement

Sidney Roche
Sidney Roche
Assistant General Counsel

Ana Peña-Wallace
Ana Peña-Wallace
Attorney

Attachment

Signed conciliation agreement and copy of civil penalty check

by S.R.

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