



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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May 22, 2006

MEMORANDUM

TO: The Commission

FROM: Lawrence H. Norton
General Counsel

By: Rhonda J. Vosdingh
Associate General Counsel for Enforcement

SUBJECT: (527 MURs – Leadership
Forum, Environment '04, LCV, MoveOn.org

I. Introduction

In the fall of 2004, we received a number of complaints alleging that a number of 527 organizations had violated the FECA, with some organizations named in multiple complaints. Shortly thereafter, we circulated to the Commission a single First General Counsel's Report addressing all of these complaints and respondents, and the Commission found reason to believe on one or more legal theories, including political committee status, coordination, and/or allocation. Since that time, we have processed these MURs generally under either a single MUR number or multiple MUR numbers that, due to the overlapping respondents, result in administrative records that can be somewhat confusing. In the interest of more streamlined record-keeping, we recommend some changes that would consolidate groups of respondents under separate MUR numbers. These changes would entail severing certain respondents from some MURs and opening new MURs that would involve only a particular group of respondents, as detailed below.

II.

time, we recommend that the Leadership Forum be severed
separate new MUR

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and moved to a

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III.

In addition, we recommend that the following respondents be severed and moved into new separate MURs: a) Environment 2004 (527) and Environment 2004 PAC and Aimee Christensen, as Treasurer; b) League of Conservation Voters 527; League of Conservation Voters Action Fund and Barbara Gonzalez-McIntosh, as Treasurer; c) MoveOn PAC and Wesley Boyd, as Treasurer, and MoveOn.org Voter Fund.

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RECOMMENDATIONS

1. Sever the Leadership Forum and open a new MUR;
- 2.
- 3.
4. Sever Environment 2004 (527) and Environment 2004 PAC and Aimee Christensen, as Treasurer, and open a new MUR;
5. Sever League of Conservation Voters 527; League of Conservation Voters Action Fund and Barbara Gonzalez-McIntosh, as Treasurer, and open a new MUR;
6. Sever MoveOn PAC and Wesley Boyd, as Treasurer, and MoveOn.org Voter Fund; and open a new MUR;
- 7.

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