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**BEFORE THE FEDERAL ELECTION COMMISSION**

2 In the Matter of )  
 3 )  
 4 1099 L C d/b/a Venice Nissan )  
 5 Donald M Caldwell )  
 6 Brad S Combs )  
 7 Carlo A Bell )  
 8 Jason A Martin )  
 9 William F Mullins )  
 10 Jack Prater )  
 11 Marvin L White )  
 12 )  
 13 )

MUR 6054

**CELA**

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FEDERAL ELECTION  
COMMISSION

**GENERAL COUNSEL'S REPORT #6**

14 **I. ACTIONS RECOMMENDED**

15 (1) Accept the attached conciliation agreement and close the file as to 1099 L C d/b/a  
 16 Venice Nissan ("VN") and Donald M Caldwell, (2) take no further action and close the file as to  
 17 Brad S Combs, and (3) close the file as to Carlo A Bell, Jason A Martin, William F Mullins,  
 18 Jack Prater, and Marvin L White

19 **II. DISCUSSION**

20 **A. VN and Donald M. Caldwell**

21  
 22 On June 29, 2010, the Commission found probable cause to believe that VN and  
 23 Caldwell (collectively, "Respondents") violated 2 U S C § 441f and that VN violated 2 U S C  
 24 § 441a(a), in connection with making excessive contributions in the name of another to Vern  
 25 Buchanan for Congress ("VBFC") The Commission also approved a conciliation agreement for  
 26 Respondents,  
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**23**                   : **Accordingly, we recommend that the Commission accept the attached conciliation**  
**24** **agreement and close the file as to 1099 L C d/b/a Venice Nissan and Donald M Caldwell**

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1           **B. Brad S. Combs**

2           On June 23, 2009, the Commission found reason to believe that Brad S Combs, a finance  
3 manager at VN, violated 2 U S C § 441f based on the available information suggesting that he  
4 may have assisted VN in making contributions in the names of VN employees See MUR 6054  
5 FGCR at 10-15 The investigation in this matter, including an interview of Combs, did not  
6 reveal evidence that Combs participated in the reimbursement of any contributions  
7 Accordingly, we recommend that the Commission take no further action and close the file as to  
8 Brad S Combs

9           **C. Carlo A. Bell, Jason A. Martin, William F. Mullins, Jack Prater,  
10 and Marvin L. White**

11           Respondents Carlo A Bell, Jason A Martin, William F Mullins, Jack Prater, and Marvin  
12 L White were Donald Caldwell's subordinate managers at VN whose contributions to VBFC  
13 were reimbursed by VN The Commission determined on June 23, 2009, to take no action at that  
14 time with respect to these respondents because the available information did not suggest that any  
15 of them played an active role in the alleged reimbursements See MUR 6054 FGCR at 15-16  
16 The investigation in this matter, including interviews of Bell and depositions of Martin, Mullins,  
17 Prater and White, did not reveal evidence that they played any greater role in organizing or  
18 executing the reimbursements Accordingly, we recommend that the Commission close the file  
19 as to Carlo A Bell, Jason A Martin, William F Mullins, Jack Prater, and Marvin L White

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21           **III. RECOMMENDATIONS**

- 22           1 Accept the attached conciliation agreement and close the file as to 1099 L C d/b/a  
23 Venice Nisman and Donald M Caldwell  
24  
25           2 Take no further action and close the file as to Brad S Combs  
26  
27           3 Close the file as to Carlo A Bell, Jason A Martin, William F Mullins, Jack Prater,  
28 and Marvin L White  
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4 Approve the appropriate letters

Thomassenia P Duncan  
General Counsel

8-11-10  
Date

BY

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