



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 29, 2005

MEMORANDUM

TO: The Commission

THROUGH: James A. Pehrkon
Staff Director

FROM: Allan D. Silberman
Director, ADR Office

SUBJ: Negotiated Settlement: **ADR 205**

Attached for your review is a signed negotiated ADR settlement agreement, **ADR 205** (RAD 04L-10), Oakland County (MI) Democratic Party and Richard Wallace, Treasurer (the "Respondents"). This matter was opened on October 25, 2004 and assigned to the ADR Office on November 12, 2004.

ADR 205/RAD 04L-10: RAD determined that Respondents disclosed additional disbursements that in the aggregate equal \$165,581.67 on their 2003 Mid Year Report and \$116,694.76 on the 2003 Year End Report. The aforementioned amounts represent an increase of 46.3% over disbursements reported on the initial 2003 Mid Year Report and an increase of 29.2% over disbursements reported on the initial 2003 Year End Report. Respondents explained that the additional disclosure was prompted by a letter from the FEC noting the lack of administrative expenses listed on the initial Mid Year Report. Respondents contend they believed all expenses had been properly disclosed. In reply to a Request for Additional Information (RFAI), Respondents reported that they learned that a number of transactions had been omitted or incorrectly reported on their 2003 Mid Year Report. Once detected, Respondents advised they filed corrected reports with the Commission. In response to a RFAI sent regarding the Year End Report, Respondents advised that the additional disclosure resulted from their review of their original report, which revealed omissions. Two days after discovering the errors, Respondents filed an amended report with the Commission with the omitted transactions.

ADR Director's Recommendation: We recommend that the Commission approve the attached negotiated agreement **ADR 205** and subsequently close the file on this matter.

25190260540