



FEDERAL ELECTION COMMISSION
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SENSITIVE

MEMORANDUM

May 30, 2008

TO: The Commission

THROUGH: Patrina M. Clark *pmc*
Staff Director

FROM: John D. Gibson *JDG*
Chief Compliance Officer

Deborah Ruth Kant *DRK*
Director, ADR Office

SUBJECT: ADR 420 Carney for Congress and Larry Golden, Treasurer,
Recommendation to Approve Settlement Agreement¹

RESOLUTION TERMS: Issuance of internal controls policy under the Commission's April 5, 2007 guidance; FEC training; hiring a campaign finance firm; and civil penalty of \$1,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 420 (RAD 07L-37). This case was received by the ADR Office on September 25, 2007, and was assigned to the ADR Office on October 16, 2007.

SUMMARY: A committee may be referred for audit under the Act if the cumulative nature of the reporting errors reveals the committee is not in substantial compliance with the law. 2 U.S.C. § 438(b). The Reports Analysis Division referred the Respondents (or "the Committee") for cumulative errors during the 2006 election cycle. Some of the errors involved mathematical discrepancies and failure to file 48-hour notices of contributions of \$1000 or more. The errors also included failing to disclose the identifying information of contributors whose contributions are over \$200, and failing to disclose information relating to disbursements over \$200.

¹ Larry Golden replaced Charles Bullock as Treasurer after the Commission approved assignment to the ADR Office.

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RECOMMENDATIONS:

1. Approve the attached settlement agreement of Carney for Congress and Larry Golden, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.