



Federal Election Commission
Washington, DC 20463

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MEMORANDUM

November 19, 2007

TO: The Commission

THROUGH: Patrina M. Clark
Staff Director

FROM: John D. Gibson
Chief Compliance Officer

Deborah Ruth Kane
Director, ADR Office

SENSITIVE

SUBJECT: ADR 430 United Food & Commercial Workers International, Union Active Ballot Club and Anthony M. Perrone, Treasurer, Recommendation to Assign¹

ADR Case: ADR 430

Source No. RR 07L-45

Respondents:
United Food & Commercial Workers
International Union Active Ballot Club and
Anthony M. Perrone, Treasurer

Respondents' Rep.:
Anthony M. Perrone

Referral: OGC

Committee Name: United Food & Commercial
Workers International, Union Active Ballot Club

Date Referral Filed: 10/26/07

Committee Type: Unauthorized

Date Forwarded to ADRO: 11/01/07

Election Cycle: 2006

¹ The Office of General Counsel reviewed the ADR Memorandum, and concurs in the description of the case.

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Summary and Analysis of Case: Treasurers of political committees are required to report all financial activity, including all receipts. 2 U.S.C. §§ 434(a) 434(b)(2), 11 C.F.R. § 104.3(a). In this case, Respondents (or "the Committee") failed to disclose \$100,973.92 in receipts in its 2006 Year End Report., (a 24.3% percent increase). The Committee filed the report on January 30, and filed the amended reporting disclosing the additional receipts on March 13, 2007. In response to an RFAI, the Committee filed an electronic submission explaining that the contributions were received in the Committee's lock boxes and deposited in its bank account in December. However, the Committee's reporting system did not recognize these receipts as received in December but rather as received in January. The Committee noted that its accounting system did have the receipts properly posted for December.

RECOMMENDATION:

1. **Assign ADR 430/RR 07L-45 to the ADR Office.**