



Federal Election Commission  
Washington, DC 20463

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**SENSITIVE**

**MEMORANDUM**

December 4, 2009

TO: The Commission

THROUGH: Alec Palmer  
Acting Staff Director *AP*

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

*LMF* Lynn M. Fraser  
Director, ADR Office

SUBJECT: ADR 515 Norfolk Southern Corporation Good Government Fund and  
Marque Ledoux, Treasurer, Recommendation to Approve Settlement  
Agreement

RESOLUTION TERMS: Send a representative to a FEC conference; develop and  
maintain a compliance manual; and pay a civil penalty of  
\$1,000 (amount in dispute \$102,282.28)

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to  
ADR 515 (RAD 09L-33). The ADR Office received this referral on September 25, 2009.

**SUMMARY:** In this case, RAD referred the Norfolk Southern Corporation Good  
Government Fund and Marque Ledoux, Treasurer for failing to disclose all financial  
activity on their 2009 April Monthly Report. The Committee filed an amended 2009  
April Monthly Report on May 12, 2009 that disclosed additional receipts of  
\$102,282.28.

Respondents determined that a change to the method by which their payroll software  
aggregated employee payroll deductions resulted in the payroll deduction program  
making a one-time erroneous transfer of \$102,282.28 to the Committee. Respondents  
assert they took steps to undo the change to ensure no further excessive transfers were  
made. Respondents refunded the erroneous transfer and amended all relevant reports.

Recommendation to Approve  
Settlement Agreement  
ADR 515 (RAD 09L-33)  
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