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SENSITIVE

MEMORANDUM

November 2, 2009

TO: The Commission

THROUGH: Alec Palmer *AP*
Acting Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 520 Laborers' District Council of the Metro Area of Philadelphia &
Vicinity PAC and James Harper, Sr., Treasurer, Informational Memo on
Assignment

The Reports Analysis Division referred RAD 09L-40 for processing on October 21, 2009, and the ADR Office designated the referral ADR 520. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 520 on November 6, 2009. Please contact Lynn Fraser if you have any questions or concerns before then.

Summary of Case: The Reports Analysis Division referred the Laborers' District Council of the Metro Area of Philadelphia & Vicinity PAC and James Harper, Sr., Treasurer (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2008 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's errors included, among other things: excessive, prohibited or other impermissible contributions or transfers, failure to provide supporting schedules, failure to properly itemize disbursements, failure to properly itemize debts, and failure to clarify public communication expenses and possible candidate fundraising expenses.

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