



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 1, 2022

Danny Lampley, Esq.
496 County Road 445
Oxford, MS 38655

Re: ADR 1052 & ADR 1053 – LAFAYETTE COUNTY DEMOCRATIC PARTY
and Susan Fino, Treasurer (C00532788)

Dear Danny Lampley, Esq.:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matters. The Negotiated Settlement was approved by the Commission on March 30, 2022 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case numbers. For your convenience, a compliance chart is attached.

Under the terms of the agreement, a civil penalty in the amount of \$200 is due on April 29, 2022. Kindly review the attached payment instructions for details on payment methods and the collection of unpaid debts.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua Rebollozo". The signature is fluid and cursive, with the first name "Joshua" and last name "Rebollozo" clearly distinguishable.

Joshua A. Rebollozo
Assistant Director
Alternative Dispute Resolution Office

Enc: Payment Instructions
Compliance Chart
Negotiated Settlement

ADRO Civil Penalty Payment Instructions

You may remit payment by credit card, debit card, or ACH withdrawal from your bank account through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/adrpayment to be directed to Pay.gov's FEC ADR Payment form.

Unpaid Civil Penalties

Unpaid civil money penalties will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

ADR 1052 and 1053 Compliance Chart

Type	Date Due
Attend FEC seminar	March 30, 2023
Certify internal control procedures have been consistently followed	March 29, 2024



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Case Number: ADR 1052 (RR 20L-11) &
ADR 1053 (P-MUR 645)

Case Name: LAFAYETTE COUNTY DEMOCRATIC PARTY

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (FEC or the Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Danny Lampley, Esq., representing LAFAYETTE COUNTY DEMOCRATIC PARTY and Susan Fino, in the official capacity of Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

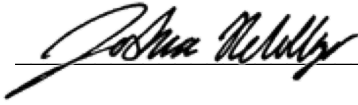
1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Reports Analysis Division (RAD) referred Respondents for disclosing apparent unauthorized disbursements totaling \$13,500 in its 2019 Mid-Year Report. On November 24, 2020, Respondents filed a *sua sponte* submission stating that the Committee's previous treasurer¹ issued checks to himself and his corporation and made debit card withdrawals for personal expenses from the Committee's bank account totaling \$14,523.87. On February 16, 2022, the Committee filed an amended 2019 Mid-Year Report, to update the total amount of unauthorized disbursements to \$15,297.63.
4. Treasurers of political committees are required to report all financial activity, including all receipts and disbursements, pursuant to the FECA. 52 U.S.C. §§ 30104(b)(2) and (4), 11 C.F.R. §§ 104.3(a) and (b).

¹ The former treasurer served as the Committee's treasurer from December 10, 2018 to August 10, 2019, however, the Committee never filed a Statement of Organization (FEC Form 1) to reflect the change.

5. The Committee states after discovering the unauthorized disbursements it appointed a new treasurer, notified law enforcement, contacted its RAD analyst, and began drafting new internal controls to prevent a future occurrence. The Committee states it has since implemented new internal controls and stricter oversight, including implementing monthly reconciliations, requiring disbursements over \$500 to be authorized by two persons, recording receipts as mail is opened, implementing a back-up system to avoid loss of electronic data, and implementing additional levels of reconciliation by a member of the Executive Committee.
6. Respondents, in an effort to resolve this matter, agree to: (a) certify internal control procedures consistent with those described in the Commission's Internal Controls and Political Committees advisory document (2007) and the Best Practices for Committee Management (published in the April 2009 Record, available at www.fec.gov/pages/brochures/bestpractices.shtml) and as recommended to the Committee by the FEC's Audit Division in a memorandum dated November 19, 2021, have been followed consistently for two (2) years from the effective date of this agreement; (b) certify that a representative of the Committee participated in an FEC conference, webinar, or other training program developed in consultation with the FEC's Information Division within twelve (12) months of the effective date of this agreement; and (c) pay a civil penalty of \$200 within thirty (30) days of the effective date of this agreement.
7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance. Unpaid civil money penalties are subject to the Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. § 3701 et seq. The Commission will transfer debt to the United States Department of the Treasury (Treasury) for collection.
9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraph 6 above and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 1052 (RR 20L-11) and ADR 1053 (P-MUR 645), and resolves those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

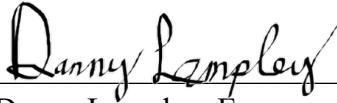
Joshua A. Rebollozo, Assistant Director
Alternative Dispute Resolution Office

A handwritten signature in black ink, appearing to read "Joshua Rebollozo", written over a horizontal line.

March 30, 2022

Date Signed

FOR THE RESPONDENTS:

A handwritten signature in black ink, appearing to read "Danny Lampley", written over a horizontal line.

Danny Lampley, Esq.
Representing LAFAYETTE COUNTY
DEMOCRATIC PARTY and Susan Fino,
Treasurer

March 21, 2022

Date Signed