



**Federal Election Commission  
Washington, DC 20463**

Case Number: ADR 285  
Source RR 05L-37  
Case Name: National Association of  
Federal Credit Unions PAC

### **NEGOTIATED SETTLEMENT**

This matter was initiated by the Federal Election Commission ("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 William Donovan, General Counsel, representing the National Association of Federal Credit Unions PAC, and Murray Chanow, 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 authorized in "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 2 U.S.C. § 437g.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Reports Analysis Division ("RAD") referred the Committee for failing to disclose all receipts on the Committee's 2004 Year End Report. Respondents filed an amended 2004 Year End Report on February 7, 2005 that disclosed additional receipts totaling \$56,632.53 in unitemized contributions from individuals or persons other than political committees.
4. The FECA and implementing regulations require that a political committee disclose the total amount of all receipts for the reporting period and calendar year. 2 U.S.C. § 434(b)(2)(A), 11 C.F.R. §§ 104.3(a).
5. Respondents acknowledge an inadvertent violation of FECA due to an error in their original report. Respondents contend, however, that the error was found by their own internal audit only one week after the report was originally filed. The Committee notes that it has taken other proactive steps to ensure future compliance such as hiring

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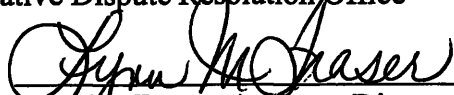
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a new treasurer and an experienced custodian of records who will serve as a FECA compliance specialist. Respondents assert that they will continue to have their reports audited internally, and consult with their General Counsel on issues of compliance.

- 6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) pay a civil penalty of \$1,000; and (b) have two staff members attend a FEC seminar for political action committees within twelve (12) months of the effective day 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 submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
- 9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with term (a) within thirty (30) days from the effective date of this agreement, and term (b) within twelve (12) months from the effective date of this agreement.
- 10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 285 (RR 05L-37), and effectively resolves this matter. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

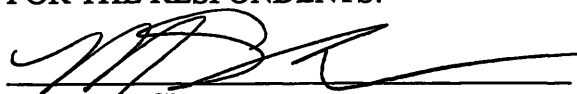
FOR THE COMMISSION:

Allan D. Silberman, Director  
Alternative Dispute Resolution Office

By:   
Lynn M. Fraser, Assistant Director  
Alternative Dispute Resolution Office

  
Date Signed

FOR THE RESPONDENTS:

  
Murray S. Chanow  
Representing the National Association of Federal  
Credit Unions PAC, and Murray Chanow, Treasurer

  
Date Signed