



**Federal Election Commission
Washington, DC 20463**

September 26, 2006

Neil Reiff, Esq.
Sandler, Reiff & Young, P.C.
50 E Street, S.E. #300
Washington, DC 20003

Re: ADR # 321
Democratic Party of Oklahoma and Nina Ritchier, Treasurer

Dear Mr. Reiff:

Enclosed is the signed copy of the agreement resolving the referral initiated on October 04, 2005 with the Federal Election Commission ("FEC/Commission") against Democratic Party of Oklahoma ("Respondents"). The agreement for ADR 321 (RR 05L-57) was approved by the Commission on September 14, 2006 – the effective date of the agreement.

Note that paragraph 9 of the agreement specifies that Respondents shall comply with the terms of this settlement within thirty (30) days of the effective date of the agreement. Please forward to this office, a statement confirming Respondents' compliance with the terms listed in paragraph 6 of the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 6.

As you are aware, the settlement agreement will be made part of the record that is released to the public. The Commission will also place on the record copies of the referral, correspondence exchanged between your office and this office prior to our entry into settlement 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 Information Office.

This agreement resolves the matter that was initiated by the Commission pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities regarding violations of federal election campaign laws. I appreciate

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your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,



Lynn M. Fraser, Acting Director
Alternative Dispute Resolution Office
202-694-1665

Enclosure: Agreement

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Federal Election Commission
Washington, DC 20463

Case Number: ADR 321
Source: RR 05L-57
Case Name: Democratic Party of Oklahoma

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 Neil Reiff, Esq., representing the Democratic Party of Oklahoma and Nina Ritchie, in her official capacity as 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 referred Respondents for failing to file four (4) 24-Hour Notices for independent expenditures, totaling \$231,000. The expenditures were made after the 20th day, but more than 24 hours, before the 2002 General Election. In an amended 2002 30 Day Post-General Report, filed on March 26, 2003, Respondents included a Schedule E disclosing four (4) independent expenditures, totaling \$231,000, all made on behalf of one (1) federal candidate.
4. The FECA requires that if a political committee makes, or contracts to make, independent expenditures in connection with an election, it may have to file 24-Hour Notices with the Commission. The 24-Hour Notice requirement is triggered each time the committee makes independent expenditures aggregating \$1,000, or more, after the 20th day, but more than 24 hours, before the day of the election. 2 U.S.C. § 434(c)(2) (2000), 11 C.F.R. § 104.4(b) (2002).
5. Respondents acknowledge a violation of FECA, which occurred due to an oversight by Committee staff. Respondents state that changes in procedures have been made to

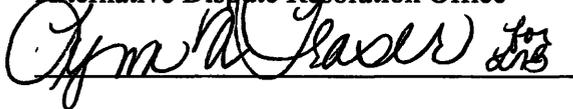
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ensure compliance in the future. Respondents contend that they have taken numerous steps to address compliance and reporting, such as appointing a new Committee Chairman, hiring an experienced comptroller following the death of the previous comptroller in 2001, and hiring an experienced compliance specialist.

6. Respondents, through recent filings and representations to the Commission, indicated that financial hardship prevents it from paying a civil penalty in excess of \$1,000. Therefore, Respondents, in an effort to avoid similar errors in the future, agree to: (a) have their compliance specialist develop a compliance manual for Committee staff reference; and (b) pay a civil penalty of \$1,000.00.
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 the terms within thirty (30) days from the effective date of this agreement.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 321 (RR 05L-57), and effectively resolves the 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:

Lynn M. Fraser
Alternative Dispute Resolution Office



9-27-06

Date Signed

FOR THE RESPONDENTS:

Neil P. Reiff, Esq.
Representing the Democratic Party of Oklahoma
and Nina Ritchie, Treasurer

8/30/06

Date Signed

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