



Federal Election Commission  
Washington, DC 20463

December 8, 2006

James F. Coffey, Esq.  
Verrill Dana, LLP  
One Boston Place, Suite 23300  
Boston, MA 02108

Re: ADR #331  
Massachusetts Republican State Congressional Committee and Brent Anderson,  
Treasurer

Dear Mr. Coffey:

Enclosed is the signed copy of the agreement resolving the referral initiated on May 24, 2006 with the Federal Election Commission ("FEC/Commission") against Massachusetts Republican State Congressional Committee and Brent Anderson, Treasurer ("Respondents"). The agreement for ADR 331 (RR 06L-19) was approved by the Commission on December 1, 2006 – the effective date of the agreement.

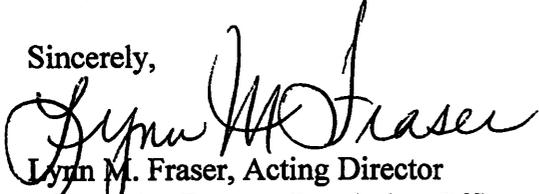
Note that paragraph 9 of the agreement specifies that Respondents shall comply with the terms (a) and (b) in paragraph 5 within thirty (30) days of the effective date of the agreement. Respondents shall comply with term (c) in paragraph 5 prior to December 31, 2007, and term (d) in paragraph 5 prior to December 1, 2008. Please forward to this office, a statement confirming Respondent's compliance with the terms listed in paragraph 5 of the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 5.

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.

5/10/17/2017/5

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 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

2/19/02/1074



**Federal Election Commission  
Washington, DC 20463**

Case Number: ADR 331  
Source: RR 06L-19  
Case Name: Massachusetts Republican State  
Congressional Committee

### **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 James F. Coffey, Esq., representing the Massachusetts Republican State Congressional Committee and Brent Anderson, in his 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.

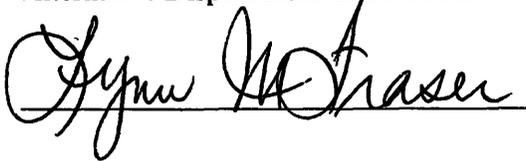
Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

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 ("RAD") for failing to disclose all financial activity on their 2003 June Monthly Report. Specifically, the Committee filed an amended 2003 June Monthly Report that disclosed additional disbursements totaling \$56,286.90.
4. The FECA requires political committees to disclose all financial activity for the reporting period and the calendar year. 2 U.S.C. § 434(b)(4)(A) (November 2002), 11 C.F.R. §§ 104.3(b)(1)(i)(A), 104.3(b)(1)(i)(B) (January 1, 2003).
5. Respondents in an effort to avoid similar errors in the future, agree to: (a) update the Compliance Desk Reference; (b) pay a civil penalty of \$1,800; (c) send a Committee representative to a FEC seminar within twelve months of the effective date of the agreement.

6. 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.
7. 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.
8. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with terms (a) and (b) in paragraph 5 above within thirty (30) days from the effective date of this agreement. Respondents shall comply with term (c) in paragraph 5 above prior to December 31, 2007, and term (d) in paragraph 5 above prior to December 31, 2008.
9. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 331 (RR 06L-19), 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.

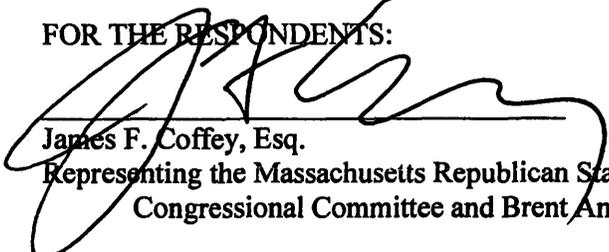
FOR THE COMMISSION:

Lynn M. Fraser, Acting Director  
Alternative Dispute Resolution Office

  
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12/1/06  
Date Signed

FOR THE RESPONDENTS:

  
\_\_\_\_\_

James F. Coffey, Esq.  
Representing the Massachusetts Republican State  
Congressional Committee and Brent Anderson, Treasurer

11/21/06  
Date Signed

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