



THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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**SENSITIVE**

MEMORANDUM

March 14, 2007

TO: The Commission

THROUGH: Patrina M. Clark *Jms for Pmc*  
Staff Director

FROM: Margarita Maisonet *MM*  
Chief Compliance Officer

Deborah Kant *DK*  
Director, ADR Office

BY: Lynn M. Fraser *LMF*  
Assistant Director, ADR Office

SUBJECT: ADR 351 Republican State Committee of Delaware and Thomas J. Shopa,  
Treasurer, Recommendation to Approve Settlement Agreement

**RESOLUTION TERMS:** Attendance at a FEC seminar and a civil penalty of \$1,500

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 351 (RR 06L-23)**. This case was opened on September 27, 2006, and was assigned to the ADR Office on December 4, 2006.

**SUMMARY:** In this case, the Reports Analysis Division (RAD) referred the Republican State Committee of Delaware and Thomas J. Shopa, Treasurer ("Respondents" or the "Committee") for failing to disclose all financial activity on their 2004 30 Day Post-General Report. The aggregate additional disbursements was \$81,584.05 for the two amended reports.

Respondents filed the original 2004 30 Day Post-General Report on December 2, 2004. Respondents filed an Amended 30 Day Post-General Report on May 6, 2005, that disclosed additional disbursements totaling \$79,004.62. Shortly thereafter, on June 20, 2005, Respondents filed a miscellaneous electronic

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submission, contending that two transactions had not been included as disbursements when the original 2004 30 Day Post-General Report was filed.

Respondents filed a second Amended 2004 30 Day Post-General Report on April 27, 2006, disclosing a slightly revised amount for one of the transfers and additional disbursements. On May 25, 2006 Respondents then filed a second miscellaneous electronic submission stating "When these transfers occurred in October of 2004, the Committee's staff person ... entered these transfers into our accounting software system. The transfers did not, however, flow through to our reporting software, and thus were not included in the Committee's original 30 Day Post-General FEC report filed in December of 2004. The Committee has subsequently taken several steps to insure that such omissions do not recur, including additional internal reviews prior to filing."

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Republican State Committee of Delaware and Thomas J. Shopa, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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