



Federal Election Commission
Washington, DC 20463

November 21, 2008

Karl J. Sandstrom, Esq.
607 14th St., NW
Washington, DC 20005

Re: ADR 415 (RAD 07L-32)
Kilroy for Congress Committee and Sanford A. Meizlish, Treasurer

Dear Mr. Sandstrom:

Enclosed is the signed copy of the agreement resolving the referral initiated on September 14, 2007 with the Federal Election Commission ("FEC/Commission") against Kilroy for Congress Committee and Sanford A. Meizlish, Treasurer ("Respondents"). The agreement for ADR 415 (RAD 07L-32) was approved by the Commission on November 5, 2008 – the effective date of the agreement.

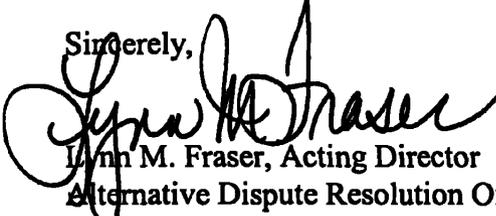
Note the specific time frames for compliance in paragraph 9 of the agreement. Please forward to this office, a statement confirming Respondent's compliance with the terms listed in paragraph 6 of the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 6 and contain the ADR caption and case number. **The civil penalty payment should be sent to the attention of the Accounting/Finance Office of the FEC. The civil penalty under the agreement is due on December 5, 2008. Please put the ADR case number on the civil penalty check as well, to ensure crediting to the correct case.**

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.

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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

cc: Angela Dillard, Finance and Accounting Office
Ken Pezzella, Finance and Accounting Office
Room 819



**THE FEDERAL ELECTION COMMISSION
Washington, DC 20463**

Case Number: ADR 415
Source: RAD 07L-32
Case Name: Kilroy for Congress

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 ("the FECA"), and resolve this matter, the Commission entered into negotiations with Karl J. Sandstrom, Esq. representing Kilroy for Congress and Sanford A. Meizlish, in his official capacity as Treasurer (collectively "Respondents" or "the Committee"). 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 2 U.S.C. § 437g.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Reports Analysis Division referred the Respondents for failing to disclose \$87,455.17 in receipts on its 2006 30 Day Post-General Report, filed on December 7, 2006. The Committee filed an amended report on January 4, 2007 disclosing the additional receipts.
4. In an electronic submission to the Reports Analysis Division on March 24, 2007, the Committee explained that the increased receipts resulted from an internal miscommunication relating to transmitted electronic files of contributions received through Emily's list. The Committee has further explained that it believes, due to an unintentional error, not all the contributions from Emily's List had been correctly imported into the Committee's software, and when the Committee discovered the discrepancy, it promptly amended its report. The Committee stated that there are newly- implemented procedures in place aimed at accurate reporting, including:

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having personnel experienced in campaign finance reporting review each report, file the reports, and reconcile bank statements to the reports before they are filed. In addition, the Committee stated that staff had completed campaign finance training.

5. Treasurers of political committees are required to report all financial activity, including all receipts. 2 U.S.C. §§ 434(a), 434(b)(2), 11 C.F.R. § 104.3(a).
6. Respondents, in an effort to resolve this matter, agree to: (a) develop and issue a compliance manual; (b) issue an internal controls policy consistent with the Commission's April 5, 2007 guidance; (c) submit the policy to the Commission; and (d) pay a \$2900 penalty.
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 set forth in paragraph 6 within thirty (30) days of the effective date of this agreement.
10. This Negotiated Settlement constitutes the entire agreement between the parties on the resolution of ADR 415 (RAD 07L-32), and effectively resolves only those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party that is not included herein shall be enforceable.

FOR THE COMMISSION:

By:  11-5-08
 Deborah Ruth Kant, Director Date Signed
 Alternative Dispute Resolution Office

FOR THE RESPONDENTS:

 March 4, 2008
 Karl J. Sandstrom, Esq. Date Signed
 Representing Kilroy for Congress,
 and Sanford A. Meizlish, in his official capacity as Treasurer