



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2009 DEC 30 P 4: 02

SENSITIVE

MEMORANDUM

December 30, 2009

TO: The Commission

THROUGH: Alec Palmer *[Signature]*
Acting Staff Director

FROM: John D. Gibson *[Signature]*
Chief Compliance Officer

Lynn M. Fraser *[Signature]*
Director, ADR Office

SUBJECT: ADR 508 Wyoming Republican Party and Donna Robitaille, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Conduct a review and evaluate the Committee's FECA reporting practices and procedures, codify all recommended improvements in procedures, and certify the implementation of the recommendations; review and evaluate the Committee's internal controls procedures consistent with the best practices contained in the Commission's Internal Controls policy; and pay a civil penalty of \$1,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 508 (RAD 09L-30). The ADR Office received this referral on August 20, 2009.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred the Wyoming Republican Party and Donna Robitaille, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2008 30 Day Post-General Report. Respondents filed an amended 2008 30 Day Post-General Report to disclose additional disbursements totaling \$129,103.08.

Respondents contend that the inadvertent omission of additional disbursements arose in the context of improvements to reporting procedures initiated by Respondents, including upgrading software for reporting and the retention of a compliance specialist.

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RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Wyoming Republican Party and Donna Robitaille, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.