



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

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**SENSITIVE**

**MEMORANDUM**

March 2, 2010

TO: The Commission

THROUGH: Alec Palmer *AP*  
Acting Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Lynn M. Fraser *LMF*  
Director, ADR Office

SUBJECT: ADR 514 Doug Heckman for Congress and Jennifer C. Pinson-Harvey,  
Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and maintain a compliance operations manual; send a representative to a FEC conference; and pay a civil penalty of \$1,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 514 (RAD 09L-32). The ADR Office received this referral on September 10, 2009.

**SUMMARY:** In this case, the Reports Analysis Division (RAD) referred Respondents for failing to disclose all financial activity on their 2008 12 Day Pre-General Report. Respondents filed an amended 2008 12 Day Pre-General Report on November 10, 2008 that disclosed the same amount of disbursements as originally disclosed. The Committee filed a second amended 2008 12 Day Pre-General Report on May 21, 2009 that disclosed additional disbursements of \$50,672.30.

Respondents acknowledge their inadvertent reporting omission, and contend that the Committee was inexperienced and staffed with volunteers. In addition, Committee staff worked with Commission staff to determine where the problem was, and filed the second amended 2008 12 Day Pre-General Report when the problem was identified.

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**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Doug Heckman for Congress and Jennifer C. Pinson-Harvey, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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