



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

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SENSITIVE

MEMORANDUM

April 30, 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 516 New Jersey Republican State Committee and John O. Bennett,
Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and implement a process for tracking the receipt and response to communications from the Commission; send a representative to a FEC conference; and pay a civil penalty of \$3,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 516 (RAD 09L-35). The ADR Office received this referral on October 14, 2009.

SUMMARY: The Reports Analysis Division referred the New Jersey Republican State Committee and John O. Bennett, Treasurer (Respondents or the Committee) for cumulative errors during the 2008 election cycle which disclosed the Committee was not in substantial compliance with the FECA. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. 2 U.S.C. § 437(g).

Respondents acknowledge reporting challenges during the 2008 election cycle which occurred due to cost saving measures the Committee undertook. Respondents contend that they've taken steps to address any deficiencies and ensure future compliance.

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RECOMMENDATIONS:

1. Approve the attached settlement agreement of the New Jersey Republican State Committee and John O. Bennett, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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