



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

July 15, 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

Krista J. Roche *KJR*
Assistant Director, ADR Office

SUBJECT: ADR 542 Seafarers Political Activity Donation – Seafarers International Union of N.A. - AGLIWD/NMU and Suzanne L. Plourde, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Cross-train additional staff in committee operations and FEC reporting requirements; develop and implement procedures for tracking communications from the FEC; attend a FEC conference; participate in a teleconference with the committee's assigned RAD Analyst; and pay a civil penalty of \$5,000.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 542 (RAD 10L-05). The ADR Office received this referral on May 12, 2010.

SUMMARY: RAD referred Seafarers Political Activity Donation – Seafarers International Union of N.A. – AGLIWD/NMU and Suzanne L. Plourde, Treasurer (Respondents or the Committee) for receiving \$123,900.00 from its connected organization

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disbursement was made. The Committee subsequently refunded the reimbursement one hundred and thirty-nine (139) days after it was received.

Respondents contend that due to a dramatic decline in the previous Treasurer's health, she was unable to provide sufficient consultation to her successor. Respondents contend the new Treasurer believed the reimbursement was permissible because in prior years, the connected organization reimbursed the Committee for the identical administrative expense, albeit all previous reimbursements occurred timely. Respondents further contend that once the new Treasurer became aware of the communication from the Reports Analysis Division (which had been addressed to her predecessor), the appropriate refund was made within one (1) week.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Seafarers Political Activity Donation – Seafarers International Union of N.A. – AGLIWD/NMU and Suzanne L. Plourde, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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