



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

December 3, 2010

TO: The Commission

THROUGH: Alec Palmer *AP*
Acting Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Lynn M. Fraser *LF*
Director, ADR Office

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

SUBJECT: ADR 548 Baldwin Title Company LLC PAC and Barry J. Palmer,
Treasurer, Memorandum to Approve Settlement Agreement

RESOLUTION TERMS: Send two Committee representatives to a FEC conference; develop and implement a policy and procedure manual; conduct an internal training and education program for Committee staff and volunteers; implement internal controls; and pay a civil penalty of \$3,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 548 (RAD 10L-07). The ADR Office received this referral on October 6, 2010.

SUMMARY: RAD referred Baldwin Title Company LLC PAC and Barry J. Palmer, Treasurer (Respondents or the Committee) for receiving prohibited contributions and making excessive contributions during the second half of 2009. The Committee received prohibited contributions from its connected organization and an apparent corporation totaling \$23,500. At the time of the referral, \$21,000 of prohibited contributions remained unrefunded. The Committee also made excessive contributions to federal candidates totaling \$7,800, which were neither refunded nor redesignated within the permissible timeframe. Respondents contend that all errors and omissions occurred due to inexperience.

Recommendation to Approve
Settlement Agreement
ADR 548 (RAD 10L-07)
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RECOMMENDATIONS:

1. Approve the attached settlement agreement of Baldwin Title Company LLC PAC and Barry J. Palmer, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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