



FEDERAL ELECTION COMMISSION
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SENSITIVE

MEMORANDUM

December 21, 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

SUBJECT: ADR 552 Campaign for Change and Nickolai Bobrov, Treasurer,
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and implement financial procedures complying with best practices; develop and implement a reporting compliance manual; pay a civil penalty of \$1,500; and send a Committee representative to a FEC conference.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 552 (RAD 10L-12). The ADR Office received this referral on November 12, 2010.

SUMMARY: In this case, RAD referred the Campaign for Change and Nicholai Bobrov, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2010 April Quarterly Report. The Committee filed its original report on April 16, 2010, followed by an amended 2010 April Quarterly Report on July 9, 2010 which disclosed additional receipts of \$120,653.26.

Respondents filed a memo text with the amended 2010 April Quarterly Report which stated that the "original report was filed with incorrect receipt and disbursement data due to data processing error."

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RECOMMENDATIONS:

1. Approve the attached settlement agreement of Campaign for Change and Nickolai Bobrov, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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