



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

March 29, 2011

TO: The Commission
THROUGH: Alec Palmer
Acting Staff Director *AP*
FROM: Patricia Carmoa *PC*
Chief Compliance Officer
Lynn M. Fraser *LF*
Director, ADR Office

SUBJECT: ADR 556 Congressional Black Caucus and Earl Jenkins, Treasurer,
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and implement a compliance operations manual which will include, *inter alia*, internal controls consistent with Commission policy, explicit financial procedures and record keeping requirements; conduct reconciliation of the Committee's financial activity to its reports annually for four (4) years beginning with CY 2011 and certify the results with the Commission no later than March 1 of the succeeding year; develop and implement a tracking system to respond to communications from the Commission; send a representative to a FEC conference; and pay a civil penalty of \$5,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 556 (RAD 10L-15). The ADR Office received this referral on December 13, 2010.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred the Congressional Black Caucus and Earl Jenkins, Treasurer (Respondents) for failing to disclose all financial activity on their 2009 Year End Report, as well as their 2010 April Quarterly Report. An amended 2009 Year End Report disclosed additional receipts of \$142,087.64 and additional disbursements of \$135,616.50. Respondents filed an amended 2010 April Quarterly Report that disclosed additional receipts of \$115,000.

Recommendation to Approve
Settlement Agreement
ADR 556 (RAD 10L-15)
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