



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

July 26, 2011

TO: The Commission

THROUGH: Alec Palmer *AP*
Acting Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Lynn M. Fraser *LHF/KR*
Director, ADR Office

SUBJECT: ADR 566 OPEIU JB Moss Voice of the Electorate (VOTE) and Mary Mahoney, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Send a representative to a FEC conference; develop and implement a compliance operations manual which includes internal controls consistent with the Commission's Internal Controls Policy (2007) and a process to track receipt of, and response to, communications with the Commission; and pay a civil penalty of \$3,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 566 (AD 09-29). The ADR Office received this referral on April 13, 2011.

SUMMARY: In this case, the Audit Division referred the OPEIU JB Moss Voice of the Electorate (VOTE) and Mary Mahoney, Treasurer (Respondents) for underreporting disbursements by \$171,938 during calendar years 2007-2008. Audit determined that a major portion of the underreporting occurred during the Committee's Post-General reporting period for 2008. In addition, Audit confirmed the Committee filed amended reports which materially corrected the underreporting.

Respondents contend that they discovered how the initial underreporting occurred and took steps to eliminate future reporting issues.

Recommendation to Approve
Settlement Agreement
ADR 566 (AD 09-29)
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