



FEDERAL ELECTION COMMISSION  
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**SENSITIVE**

**MEMORANDUM**

November 3, 2011

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Lynn M. Fraser *LF*  
Director, ADR Office

SUBJECT: ADR 570 Brady for Congress and Mike Karlins, Treasurer,  
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Conduct and certify a three (3) year internal audit and reconciliation of the Committee's financial activity and certify the results to FEC; send a representative to a FEC conference; and pay a civil penalty of \$1,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 570 (RAD 11L-10). The ADR Office received this referral on April 22, 2011.

**SUMMARY:** In this case, the Reports Analysis Division referred Brady for Congress and Mike Karlins, Treasurer (Respondents) for a failure to disclose all financial activity on their 2010 12 Day Pre-General Report. Respondents filed the original report, and subsequently filed two amended 2010 12 Day Pre-General Reports that disclosed an increase of \$50,061.58 in disbursements.

Respondents contend that they believed all the data was entered, but when it was not reflected in the report, they corrected the record and changed software.

Recommendation to Approve  
Settlement Agreement  
ADR 570 (RAD 11L-10)  
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