



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

2011 SEP 22 P 12: 59
SENSITIVE

MEMORANDUM

September 21, 2011

TO: The Commission

THROUGH: Alec Palmer *APC*
Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Lynn M. Fraser *LMS*
Director, ADR Office

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

SUBJECT: ADR 577 National Right to Life Political Action Committee and Joseph M. Landrum, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and implement a procedure for monthly reconciliation of the Committee's financial records with the financial data to be disclosed to the FEC prior to a report being filed; develop and implement a policy whereby all reports are submitted to an external compliance firm for review prior to filing; file an annual certification of Committee's annual audit of reports and banking records for calendar years 2011 and 2012; and pay a civil penalty of \$3,250.00.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 577 (P-MUR 519)**. The ADR Office received this referral on June 20, 2011.

SUMMARY: In this case, the Office of General Counsel received a *sua sponte* submission from National Right to Life Political Action Committee and Joseph M. Landrum, Treasurer, (Respondents or the Committee) dated May 11, 2011, reporting the omission of \$139,512.79 in receipts from the 2010 July Quarterly Report. On July 6, 2010, Respondents supplemented their *sua sponte* submission to

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report an increase in disbursements of \$112,068.33 on the Committee's amended 2010 30 Day Post-General Report.

Respondents have amended the reports in question and contend they have implemented substantial remedial measures including the hiring of a consultant and revision of recordkeeping and reporting practices. Respondents contend that the contractor responsible for preparing the Committee's reports neglected to upload June receipts into the compliance software, resulting in the omission on the 2010 July Quarterly Report.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of National Right to Life Political Action Committee and Joseph M. Landrum, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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