



Federal Election Commission
Washington, DC 20463

December 1, 2011

James Bopp, Jr.
BOPP, COLESON & BOSTROM
1 South Sixth Street
Terre Haute, Indiana, 47807-3510

Re: ADR 577 (PMUR 519)
National Right to Life Political Action Committee and Joseph M. Landrum,
Treasurer

Dear Mr. DeLacy:

Enclosed is the signed copy of the agreement resolving the *sua sponte* submission dated May 11, 2011, and supplemented on June 6, 2010, by National Right to Life Political Action Committee and Joseph M. Landrum, Treasurer ("Respondents"). The agreement for ADR 577 was approved by the Federal Election Commission ("FEC" or "Commission") on November 29, 2011—the effective date of the agreement.

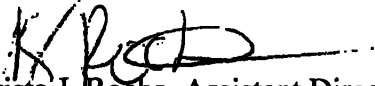
Note the specific time frames for compliance in paragraph 6 of the agreement. **Please forward to this office, a statement confirming Respondent's compliance with the terms listed in the aforementioned agreement.** The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 6, and contain the ADR caption and case number.

As you are aware, the settlement agreement will be made part of the record that is released to the public. The Commission will also place on the record copies of the referral, correspondence exchanged between your office and this office prior to our entry into settlement negotiations and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

This agreement resolves the matter that was initiated by *sua sponte* submission. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

12190292077

Sincerely,


Krista J. Roche, Assistant Director
Alternative Dispute Resolution Office
202-694-1661

Enclosure: Negotiated Settlement

cc: Gwen Holmes, Finance and Accounting Office

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Federal Election Commission
Washington, DC 20463

Case Number: ADR 577
Source: P-MUR 519
Case Name: National Right to Life PAC

NEGOTIATED SETTLEMENT

This matter was initiated by a *sua sponte* submission filed by National Right to Life Political Action Committee dated May 11, 2011, as amended by a supplemental submission dated July 6, 2011. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Federal Election Commission (Commission) entered into negotiations with Barry A. Bostram, Esq., representing National Right to Life Political Action Committee and Joseph M. Landrum, in his official capacity as Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this *sua sponte* submission. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 2 U.S.C. § 437g.
2. Respondents voluntarily enter into this agreement with the Commission.
3. On May 11, 2011, Respondents filed a *sua sponte* submission reporting the omission of \$139,512.79 in receipts from their 2010 July Quarterly Report. On July 6, 2010, Respondents supplemented their *sua sponte* submission to report an increase in disbursements of \$112,068.33 on the Committee's amended 2010 30 Day Post-General Report.
4. Treasurers of political committees are required to report all financial activity, including all receipts and disbursements, pursuant to the FECA. 2 U.S.C. §§ 434(a)(1), 434(b)(2), 434(b)(4), 11 C.F.R. §§ 104.1, 104.3(a), 104.3 (b).
5. Respondents have amended the reports in question and contend they have implemented substantial remedial measures including the hiring of a compliance consultant, the adoption of procedures consistent with the Commission's

recommended internal controls, and the completion of a thorough review and professional investigation of the circumstances. Respondents contend that the contractor formerly 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.

6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) 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 within thirty (30) days of the effective date of this agreement; (b) develop and implement a policy whereby all reports are submitted to an external compliance firm for review prior to filing within thirty (30) days of the effective date of this agreement; (c) file an annual certification of Committee's annual audit of reports and banking records for calendar years 2011 and 2012 by April 1, 2012 for calendar year 2011 and by April 1, 2013 for calendar year 2012; and (d) pay a civil penalty of \$3,250.00 within thirty (30) days of the effective date of this agreement.
7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraph 6 above.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 577 (P-MUR 519), and resolves those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

Krista J. Roche, Assistant Director
Alternative Dispute Resolution Office



11/29/11
Date Signed

FOR THE RESPONDENTS:

By A Bostrom

Barry A. Bostrom, Esq.
BOPP, COLESON & BOSTROM
Representing National Right to Life Political
Action Committee and Joseph M. Landrum, Treasurer

9-16-11
Date Signed

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