



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

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**SENSITIVE**

**MEMORANDUM**

September 22, 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 578 Friends of Jack Kingston and J. Harry Haslam, Jr., Treasurer,  
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: 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; send a representative to a FEC conference; and pay a civil penalty of \$1,500 within thirty

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 578 (RAD 11L-16). The ADR Office received this referral on June 24, 2011.

**SUMMARY:** In this case, the Reports Analysis Division referred Friends of Jack Kingston and J. Harry Haslam, Jr. (Respondents or the Committee) for failing to disclose all financial activity on their 2010 12 Day Pre-General Report. The Committee filed an amended 2010 12 Day Pre-General Report on January 31, 2011 which disclosed additional disbursements totaling \$74,859.62.

Recommendation to Approve  
Settlement Agreement  
ADR 578 (RAD 11L-16)  
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