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**SENSITIVE**

**MEMORANDUM**

November 10, 2011

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia Carmona *PC for AC*  
Chief Compliance Officer

Lynn M. Fraser *LMF*  
Director, ADR Office

SUBJECT: ADR 588 Montana Republican State Central Committee and Debra A. Brown,  
Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and implement a policy that all required FEC Notices for independent expenditures shall be presented to the committee for review prior to an independent expenditure being made; enter into a two-year contract with a vendor experienced in campaign finance reporting to ensure compliance; and pay a civil penalty of \$2,500 in two payments of \$1,250 each.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 588 (RAD 11L-22). The ADR Office received this referral on August 19, 2011.

SUMMARY: In this case, the Reports Analysis Division referred Respondents for failing to timely file one (1) 24-Hour Notice to support one (1) independent expenditure totaling \$40,000 made after the 20<sup>th</sup> day before, but more than 24 hours prior to, the 2010 General Election.

Respondents acknowledge inadvertently failing to file one 24 Hour Notice timely. Respondents contend, however, that they reported \$60,000 in disbursements for independent expenditures, but failed to file the relevant 24 Hour Notice timely.

Recommendation to Approve  
Settlement Agreement  
ADR 588 (RAD 11L-22)

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