



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION COMMISSION
SECRETARIAT

2012 JAN 27 P 4: 23

SENSITIVE

MEMORANDUM

January 27, 2012

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia Carmaha *PC*
Chief Compliance Officer

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 594 Democratic Party of Orange County FED PAC and David Gould,
Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual which includes internal controls consistent with the Commission's Best Practices for Committee Management (2009 update) and a process to track receipt of, and response to, communications with the Commission; develop and certify implementation of a process whereby the Chair of the board of directors and the Treasurer receive and review monthly bank statements and account reconciliations, and have on-line banking access with the necessary training; develop and certify implementation of a financial overview process whereby the Chair of the board of directors and the Treasurer have access to Netfile, and that both individuals review each report prior to it being filed with the FEC; send two representatives, one of whom will be a member of the board of directors, to a FEC conference; and pay a civil penalty of \$2,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 594 (Audit 09-12). The ADR Office received this referral on October 6, 2011.

Recommendation to Approve
Settlement Agreement
ADR 594 (Audit 09-12)
Page 1

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