



RESOLUTIVE
FEDERAL ELECTION
COMMISSION
SECRETARIAT

FEDERAL ELECTION COMMISSION 2012 APR -5 P 1:30
WASHINGTON, D.C. 20463

SENSITIVE

April 5, 2012

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Lynn M. Fraser *LF/KR*
Director, ADR Office

SUBJECT: ADR 602 Moran for Kansas and Timothy E. Gottschalk, Treasurer
Withdrawal and Resubmission of Recommendation to Approve Settlement
Agreement

RESOLUTION TERMS: Develop and certify implementation of a second level review of all FEC reports prior to the report being filed; 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; and pay a civil penalty of \$3,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 602 (RAD 12L-05)**. The ADR Office received this referral on February 2, 2012.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred Moran for Kansas and Timothy E. Gottschalk, Treasurer (Respondents) for failing to disclose all financial activity on their 2010 30 Day Post-General Report. Respondents filed two Amended 2010 30 Day Post-General Reports, on May 9, 2011 and August 29, 2011 respectively, disclosing additional debt of \$180,661.64.

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