



FEDERAL ELECTION  
COMMISSION  
WASHINGTON, D.C. 20463

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COMMISSION  
SECRETARIAT

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**SENSITIVE**

**MEMORANDUM**

April 13, 2012

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Lynn M. Fraser *AMF*  
Director, ADR Office

BY: Krista J. Roche *KJR*  
Assistant Director, ADR Office

SUBJECT: ADR 607 Karen Harrington for Congress and Janet C. Haley, 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 within sixty (60) days of the effective date of this agreement; attend an FEC seminar; and pay a civil penalty of \$1,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 607 (RAD 12L-10). The ADR Office received this referral on March 5, 2012.

**SUMMARY:** The Reports Analysis Division referred Karen Harrington for Congress and Janet C. Haley, Treasurer (Respondents or the Committee) for failure to disclose all financial activity on their 2010 30 Day Post-General, 2011 April Quarterly, and 2011 July Quarterly Reports. The Committee amended their 2010 30 Day Post-General, 2011 April Quarterly, and 2011 July Quarterly Reports to

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disclose additional receipts of \$223.75, additional disbursements of \$5,421.92, and additional debts of \$55,878.41, an aggregate increase in activity totaling \$61,524.08.

Respondents contend that the errors were inadvertent and the reports were amended voluntarily as soon as the Committee discovered the errors.

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Karen Harrington for Congress and Janet C. Haley, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.