



FEDERAL ELECTION COMMISSION
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SENSITIVE

MEMORANDUM

June 12, 2012

TO: The Commission

THROUGH: Alec Palmer *APC*
Staff Director

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 612 Friends of Sean Bielat and Norm Fay, 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; send a representative to FEC training; and pay a civil penalty of \$2,750.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 612 (RAD 12L-16). The ADR Office received this referral on April 5, 2012.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred Respondents for failing to disclose all financial activity. The Committee amended its 2010 October Quarterly, 2010 12 Day Pre-General, and 2010 30 Day Post-General Reports to disclose additional receipts of \$4,905.00, additional disbursements of \$48,568.03, and additional debts of \$22,239.94, an aggregate increase of \$75,712.97.

Respondents acknowledge some inadvertent omissions due to the inexperience of staff when faced with a sudden increase in financial activity, as well as misrepresentations of FEC experience by a vendor.

Recommendation to Approve
Settlement Agreement
ADR 612 (RAD 12L-16)
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