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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

May 30, 2013

TO: The Commission

THROUGH: Alec Palmer
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Lynn M. Fraser
Director, ADR Office

Lynn Fraser,
Director

Digitally signed by Lynn Fraser
DN: cn=Lynn Fraser, Director, o=Federal
Election Commission, ou=ADR Office, email=lynn.fraser@fec.gov

SUBJECT: ADR 628 Mica for Congress and W. Edward Langdon, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Designate a compliance specialist; 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 a FEC seminar; and pay a civil penalty of \$3,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 628 (RAD 13L-05). The ADR Office received this referral on March 14, 2013.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred Mica for Congress and W. Edward Langdon, Treasurer (Respondents), for failing to disclose all financial activity on their 2012 12 Day Pre-Primary Report. Amended 2012 12 Day Pre-Primary Reports were filed on August 6, 2012, October 13, 2012 and November 21, 2012 resulting in the disclosure of additional disbursements totaling \$144,297.14.

Respondents acknowledge an inadvertent omission due to a clerical error. Respondents contend the paper confirmation of the disbursement was not included for data entry in a timely manner, and the bank statement for the account was not received when the original Pre-Primary Report was prepared. It was therefore inadvertently excluded.

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RECOMMENDATIONS:

1. Approve the attached settlement agreement of Mica for Congress and W. Edward Langdon, Treasurer,
2. Approve the appropriate letters.
3. Close the file on this matter.

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