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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

August 20, 2013

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

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

SUBJECT: ADR 645 AMERIPAC: The Fund for a Greater America and Amy L. Pritchard, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual which details the Committee's new procedures to track earmarked contributions; and continue to retain outside compliance vendors to review reports for a period of two years.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 645 (RR 13L-15). The ADR Office received this referral on June 25, 2013.

SUMMARY: The Office of General Counsel transferred this matter to the ADR Office based on a referral from the Reports Analysis Division (RAD). RAD referred AMERIPAC: The Fund for a Greater America and Amy L. Pritchard, Treasurer (Respondents or the Committee) for forwarding undeposited earmarked contributions received for authorized committees more than ten (10) days after receipt on its 2012 April Monthly Report. The earmarked contributions in question total \$35,000.

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Respondents contend that the earmarked contributions were forwarded as soon as the error was discovered, and that an error of this nature has not been repeated. The Respondents indicate that all of the undeposited earmarked contributions were forwarded within the month received, and nine of the seventeen checks were forwarded only three to five days late. Respondents note that because the inadvertent delays were not extensive, all the recipient committees timely reported the contributions to the Commission. Lastly, Respondents contend that the delays can be attributed to a newly-hired staff member who was unfamiliar with the ten day rule for forwarding undeposited earmarked contributions. Respondents indicate that internal procedures have been amended to ensure an error of this nature will not occur in the future.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of AMERIPAC: The Fund for a Greater America and Amy L. Pritchard, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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