



Federal Election Commission  
Washington, DC 20463

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**SENSITIVE**

**MEMORANDUM**

August 7, 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 647 Democratic Party of Illinois and Michael Kasper, Treasurer,  
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Retain an outside consultant to review its compliance procedures and conduct an on-site training with those responsible for preparing and filing its reports; develop and certify implementation of a compliance operations manual which includes procedures to timely transfer all financial information to the appropriate external professionals responsible for preparing FEC reports; send a staff member to an FEC seminar; and pay a civil penalty of \$3,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 647 (RAD 13L-23). The ADR Office received this referral on July 2, 2013.

**SUMMARY:** The Reports Analysis Division referred Respondents for failing to disclose all financial activity. The Committee amended its 2012 30 Day Post-General Report to disclose additional receipts totaling \$143,511.19. The Committee contends that the increase largely resulted from two transfers from its nonfederal account that were inadvertently omitted from the original report. The Committee did not realize the error until it reconciled its bank accounts.

Recommendation to Approve  
Settlement Agreement  
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**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Democratic Party of Illinois and Michael Kasper, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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