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Federal Election Commission
Washington, DC 20463

MEMORANDUM

February 19, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Frase *LF*
Director, ADR Office

SUBJECT: ADR 658 National Right to Life Victory Fund and Joseph M. Landrum, 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). a process to track receipt of, and response to, communications with the Commission, and monthly reconciliation of accounts; send a representative to an FEC conference; and pay a civil penalty of \$5,156.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 658 (RAD 13L-37). The ADR Office received this referral on August 28, 2013.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred the National Right to Life Victory Fund and Joseph M. Landrum, Treasurer (Respondents or the Committee) for failing to disclose all receipts on their 2012 12 Day Pre-General Report. Respondents filed the original 2012 12 Day Pre-General Report on October 25, 2012. On December 6, 2012, the Committee filed an amended 2012 12 Day Pre-General Report that disclosed additional receipts totaling \$200,000.00.

Recommendation to Approve
Settlement Agreement
ADR 658 (RAD 13L-37)

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Respondents stated, in an electronic Form 99 filed July 18, 2013, that the receipts were inadvertently omitted from the original report as the donations had been wired directly into their account, and the monthly bank statement was not available at the time the report was filed.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of the National Right to Life Victory Fund and Joseph M. Landrum, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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