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Federal Election Commission
Washington, DC 20463

MEMORANDUM

March 31, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 668 Nebraska Democratic Party and Gerry Finnegan,
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; certify that a representative of the Committee
participated in an FEC conference; develop and certify
implementation of a quarterly compliance update training
program; and pay a civil penalty of \$5,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 668 (RAD 13L-49). The ADR Office received this referral on November 19, 2013.

SUMMARY: The Reports Analysis Division referred the Nebraska Democratic Party and Gerry Finnegan, Treasurer (Respondents or the Committee) for cumulative errors during the 2012 election cycle which disclosed the Committee was not in substantial compliance with the FECA. A political committee may be

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referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. 2 U.S.C. § 437(g).

Respondents contend that the issues occurred because they did not have adequate staff or training. The Committee contends it made changes to its financial procedures, and updated software.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Nebraska Democratic Party and Gerry Finnegan, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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