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SENSITIVE

Federal Election Commission
Washington, DC 20463

MEMORANDUM

April 4, 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

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

SUBJECT: ADR 669 State Democratic Executive Committee of
Alabama and Edgar Gentle, III, 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; and pay a civil penalty of
\$7,625.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 669 (RAD 13L-50). The ADR Office received this referral on November 19, 2013.

SUMMARY: The Reports Analysis Division referred the State Democratic
Executive Committee of Alabama and Edgar Gentle, III, Treasurer (Respondents or

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the Committee) for cumulative errors during the 2011-2012 election cycle which disclosed the Committee was not in substantial compliance with the FECA. A political committee may be 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 acknowledge some reporting challenges during the 2012 election cycle. Respondents contend that the Committee made significant enhancements to its financial procedures to ensure future compliance.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of State Democratic Executive Committee of Alabama and Edgar Gentle, III, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.