



Federal Election Commission
Washington, DC 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

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SENSITIVE

MEMORANDUM

July 25, 2014

TO: The Commission

THROUGH: Alec Palmer *fpce*
Staff Director

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

Lynn M. Fraser *lmf*
Director, ADR Office

SUBJECT: ADR 672 Friends of Christine O'Donnell and Matthew Moran, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Certify the closure of the Committee's federal account and work with Commission staff to terminate their political committee status and reporting obligations with the Commission, and continue reporting until such time as the Commission notifies the Committee that its reporting obligations have ceased.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 672 (RR 13L-39). The ADR Office received this referral from the Office of General Counsel on December 9, 2013.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred Friends of Christine O'Donnell and Matthew Moran, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2009 April Quarterly, 2010 April Quarterly, 2010 July Quarterly, 2010 October Quarterly, 2010 12 Day Pre-General, and 2010 30 Day Post-General Reports. On April 15, 2011, the Committee filed Amended 2009 April Quarterly, 2010 April Quarterly, 2010 July Quarterly, 2010 October Quarterly, 2010 12 Day Pre-General, and 2010 20 Day Post-General Reports

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disclosing additional receipts of \$87,584.09 and additional disbursements of \$330,965.93, an aggregate increase in activity totaling \$418,550.02.

Respondents contend there were some reporting errors early in the 2010 election cycle due, in the most part, to vendor data omissions. Respondents further contend that as soon as the Committee realized that a fundraising vendor was not providing adequate, correct or timely information, the Committee undertook an extensive internal audit and reconciliation. Following that process, Respondents filed amended reports to correct the record.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Friends of Christine O'Donnell and Matthew Moran, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.