

Respondents contend that the report filed on April 15, 2013 omitted a \$100,000 unlimited transfer to a national party committee, made pursuant to 2 U.S.C. § 439a(a)(4) on March 29, 2013. This transfer was not communicated at the time to the person preparing the report, and which was not reflected on the bank statements issued before the report was filed. Respondents contend further that the recipient disclosed the transfer on its own report, which was filed on April 19, 2013. Finally, Respondents contend that it discovered the omission itself, amended the report to correct the omission on its own initiative, and continue to enhance their internal procedures to ensure that similar omissions do not recur. Respondents also note that James A. Bennett is a Respondent solely in his representative capacity as Treasurer of Friends of Jim Clyburn, and that Representative James E. Clyburn is not a Respondent in this matter.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Friends of Jim Clyburn and James Bennett, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.