



**Federal Election Commission
Washington, DC 20463**

Case Number: ADR 697

Source: AD A12-01

Case Name: Caesars Entertainment Corporation PAC

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Melissa Laurenza, Esq., representing the Caesars Entertainment Corporation PAC and Lindsay J. Garcia, in her official capacity as Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

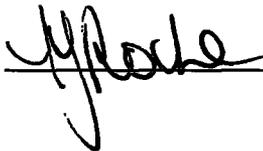
1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 2 U.S.C. § 437g.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Audit Division referred Respondents for the misstatement of financial activity and increased activity during calendar years 2011 and 2012 as detailed in Finding 1 of the Final Audit Report approved by the Commission on January 9, 2014. Specifically, the Committee understated \$22,265 in disbursements in 2012 and \$135,253 in receipts for 2011 and 2012.
4. Treasurers of political committees are required to report all financial activity, including all receipts and disbursements pursuant to the FECA. 2 U.S.C. §§ 434(b)(2) and (4), 11 C.F.R. §§ 104.3(a) and (b).
5. In response to the interim audit, the Committee filed amended reports that materially corrected the misstatements. The Committee states that prior to notification of the audit, it became aware that the person in charge of filing reports was following an improper procedure. The Committee states that with the assistance of counsel it began to file amendments in order to correct the public record. After becoming aware of the

Committee's reporting issues, Respondents states they self-initiated remedial measures including hiring a new treasurer, retaining new counsel to provide an additional review of reports prior to filing, formalizing operating procedures in a compliance manual, performing internal training, utilizing new software, appointing a team to provide monthly reviews of reports and internal records, and appointing a team to conduct quarterly internal audits.

6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) attendance at an FEC seminar within twelve (12) months of the effective date of this agreement; and (b) pay a civil penalty of \$3,950 within thirty (30) days of the effective date of this agreement.
7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraph 6 above, and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 697 (AD A12-01), and resolves those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

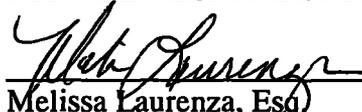
FOR THE COMMISSION:

Krista J. Roche, Assistant Director
Alternative Dispute Resolution Office



6/6/14
Date Signed

FOR THE RESPONDENTS:



Melissa Laurenza, Esq.
Representing Caesar's Entertainment Corporation PAC
and Lindsay J. Garcia, Treasurer

May 1, 2014
Date Signed