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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

May 6, 2014

TO: The Commission

THROUGH: Alec Palmer *AP PCO*
Staff Director

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

Lynn M. Frase *LF*
Director, ADR Office

SUBJECT: ADR 702, Republican Party of Florida and Jeff Howell,
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; and pay a civil penalty of \$6,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 702 (P-MUR 570). The ADR Office received this referral on March 11, 2014.

SUMMARY: In this case, the Republican Party of Florida and Jeff Howell, Treasurer (Respondents or the Committee) filed a *sua sponte* submission in which Respondents self-reported that they failed to file 48-Hour Reports for eleven (11) independent expenditures in the amount of \$213,905.06 made between December 6, 2013 and January 17, 2014 in connection with the March 11, 2014 special general election in Florida's 13th Congressional District. The 48-Hour Reports were filed on January 28, 2014 and the independent expenditures were disclosed on Schedule E of the 2013 Year End Report filed January 31, 2014 and the 2014 February Monthly Report filed February 20, 2014.

Recommendation to Approve
Settlement Agreement
ADR 702 (P-MUR 570)

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Respondents contend that the failure to file these reports was an inadvertent oversight, and that they have updated internal procedures to ensure that this omission does not reoccur.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Republican Party of Florida and Jeff Howell, Treasurer,
2. Approve the appropriate letters.
3. Close the file on this matter.

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