



FEDERAL ELECTION
COMMISSION
SECRETARIAT

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SENSITIVE

Federal Election Commission
Washington, DC 20463

MEMORANDUM

May 15, 2013

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 704 Campaign For Working Families and Dorie Velezis, 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 within sixty (60) days of the effective date of this agreement; and (b) pay a civil penalty of \$8,200.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 704 (RR 13L-43)**. The ADR Office received this referral on March 11, 2014.

SUMMARY: In this case, the Reports Analysis Division referred the Campaign For Working Families and Dorie Velezis, Treasurer, (Respondents or the Committee) for failing to file one (1) 48-Hour Report to support two (2) independent expenditures totaling \$124,037.17 disclosed on the 2012 12 Day Pre-General Report. In addition, the Committee failed to timely file one (1) 24-Hour Report totaling \$27,500 to support one (1) independent expenditure disclosed on the 2012 30 Day Post-General Report.

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Respondents contend that the late reporting of the three independent expenditures was the result of inadvertent technical or administrative errors. Respondents further contend that as the independent expenditures were disclosed on other reports the impact on the public was minimal.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Campaign For Working Families and Dorie Velezis, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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