



Federal Election Commission
Washington, DC 20463

August 27, 2014

Brian Svoboda, Esq.
PERKINS COIE, LLP
700 13th St, NW, Suite 600
Washington, DC 20005

Re: Re: ADR 709 (RAD 14L-09)
Nevada State Democratic Party and Jan Churchill, Treasurer

Dear Mr. Svoboda:

Enclosed is the signed copy of the Negotiated Settlement resolving the referral initiated on March 28, 2014 by the Federal Election Commission ("FEC/Commission") involving the above-shown Respondents. The Negotiated Settlement was approved by the Commission on August 21, 2014 – the effective date of the agreement.

Note the specific time frames for compliance in Paragraph 6 of the agreement. **Please forward to this office, a statement confirming Respondent's compliance with the terms listed in the aforementioned agreement.** The letter should note the dates on which Respondents satisfied each of the terms listed in Paragraph 6, and contain the ADR caption and case number. **The civil penalty payment should be sent to the attention of the Accounting/Finance Office of the FEC. The civil penalty under the agreement is due on or before September 20, 2014.¹ Please put the ADR case number on the civil penalty check as well, to ensure crediting to the correct case.**

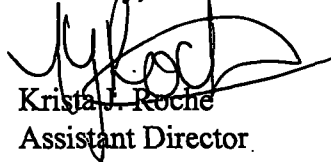
As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

¹ Please note, if the Commission refers an unpaid civil penalty to the US Treasury or third party collection agent, additional costs and fees will be assessed.

14-1082684800

This agreement resolves the matter that was initiated by the Commission pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities regarding violations of federal election campaign laws. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,



Krista J. Roche
Assistant Director
Alternative Dispute Resolution Office

Enc: Negotiated Settlement

cc: Gwendolyn Holmes, Finance and Accounting Office

14-10320640-10



Federal Election Commission
Washington, DC 20463

Case Number: ADR 709
Source: RAD 14L-09
Case Name: Nevada State Democratic Party

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 Brian Svoboda, Esq. representing the Nevada State Democratic Party and Jan Churchill, 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 Reports Analysis Division referred Respondents for failing to disclose all financial activity on their 2012 Year-End Report filed on January 31, 2013. On June 18, 2013 the Committee filed an Amended 2012 Year-End Report that disclosed \$164,020.35 in additional debt.
4. Treasurers of political committees are required to report all financial activity, including all debts, pursuant to the FECA, 2 U.S.C. § 434(b)(8), 11 C.F.R. § 104.3(d).
5. The Committee, through memo text submitted on the Amended Year End Report, filed September 20, 2013, states that the omissions were inadvertent and due to a period of high volume activity and staff turnover. The Committee contends that when it realized there were omissions, they amended the report and instituted procedures to track obligations.
6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) certify that a representative of the Committee participated in an FEC conference within twelve

