



Federal Election Commission
Washington, DC 20463

October 1, 2014

John R. Phillippe, Jr.
Republican National Committee
310 First Street, SE
Washington, DC 20003

Re: ADR 711 (RAD 14L-10)
Republican National Committee and Anthony W. Parker, Treasurer

Dear Mr. Phillippe:

Enclosed is the signed copy of the Negotiated Settlement resolving the referral initiated on April 2, 2014 by the Federal Election Commission ("FEC/Commission") involving the above-shown Respondents. The Negotiated Settlement was approved by the Commission on **September 29, 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 October 29, 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.

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 M. Roche
Assistant Director
Alternative Dispute Resolution Office

Enc: Negotiated Settlement

cc: Gwendolyn Holmes, Finance and Accounting Office



**Federal Election Commission
Washington, DC 20463**

Case Number: ADR 711
Source: RAD 14L-10
Case Name: Republican National Committee

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 John R. Phillippe, Jr., Esq., representing the Republican National Committee and Anthony W. Parker, in his 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:

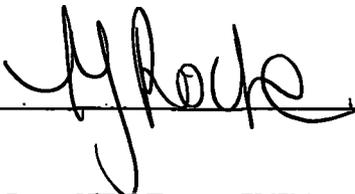
1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 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 2013 February Monthly Report originally filed on February 20, 2013. On June 21, 2013, the committee filed an Amended 2013 February Monthly Report disclosing \$106,793.60 in additional debts.
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. On October 7, 2013, the Committee filed a Miscellaneous Electronic Statement (Form 99) which stated that the original report was filed using best efforts to obtain all required information. In this Form 99 the Committee contended that the report was amended promptly upon the discovery of additional information regarding the amount and nature of outstanding debts. Respondents further contend that the error was isolated and unintentional, and upon the discovery of the error, in addition to amending its reports, the Committee also immediately took measures to prevent a

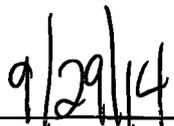
similar error from happening again, including the hiring of new personnel with extensive compliance experience.

6. Respondents, in a further effort to avoid similar errors in the future, agree to: (a) develop and certify the distribution of procedures to vendors for the identification and reporting of debts and obligations within forty-five (45) days of the effective date of this agreement; and (b) pay a civil penalty of \$3,400 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 711 (RAD 14L-10), 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:

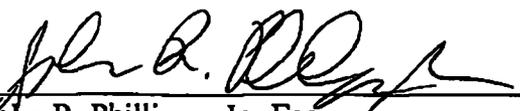
Krista J. Roche, Assistant Director
Alternative Dispute Resolution Office



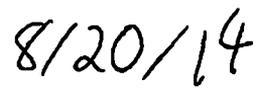


Date Signed

FOR THE RESPONDENTS:



John R. Phillippe, Jr., Esq.
Representing the Republican National Committee
and Anthony W. Parker, Treasurer



Date Signed