



FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2014 SEP 17 PM 3: 32

Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

September 17, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Lynn M. Fraser *LMF/KK*  
Director, ADR Office

BY: Krista J. Roche *KJR*  
Assistant Director, ADR Office

SUBJECT: ADR 715 Romney for President, Inc., and Darrell Crate,  
Treasurer. Recommendation to Approve Settlement  
Agreement

RESOLUTION TERMS: Pay a civil penalty of \$14,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 715 (RAD 14L-11). The ADR Office received this referral on April 14, 2014.

**SUMMARY:** The Reports Analysis Division referred Romney for President, Inc., and Darrell Crate, Treasurer (Respondents or the Committee) for failure to redesignate, reattribute, or refund excessive and prohibited 2012 Primary and General Election contributions totaling \$187,334.68 within the permissible timeframe.

The Committee received a total of \$478,932,784.11 in receipts for the election cycle. Respondents contend that they implemented substantial compliance procedures in order to handle the volume of contributions received. Due to the sheer volume that process took time, leading to remedies outside the permissible timeframe. Respondents further contend that the contributions

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identified in this referral as excessive and not remedied timely represented .04% of the total contributions. The Committee consistently filed amended reports to correct the record as the process to remedy the excessive contributions continued.

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Romney for President, Inc., and Darrell Crate, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

11-03-2011 10:00:00 AM