



FEDERAL ELECTION
COMMISSION
SECRETARIAT

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SENSITIVE

Federal Election Commission
Washington, DC 20463

MEMORANDUM

September 18, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LMF/KF2*
Director, ADR Office

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

SUBJECT: ADR 721 Committee on Letter Carriers Political Education
(Letter Carriers Political Action Fund) and Timothy C.
O'Malley, Treasurer, Recommendation to Approve
Settlement Agreement

RESOLUTION TERMS: Certify that a representative of the Committee participated
in an FEC conference; perform an annual audit for two
years, providing certification of same each year; and pay a
civil penalty of \$3,800.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 721 (RAD 14L-17). The ADR Office received this referral on May 21, 2014.

SUMMARY: The Reports Analysis Division referred the Committee on
Letter Carriers Political Education (Letter Carriers Political Action Fund) and
Timothy C. O'Malley, Treasurer (Respondents or the Committee) for failing
to disclose all financial activity on the 2012 30 Day Post-General Report
originally filed on December 5, 2012. On July 10, 2013, the Committee filed
an Amended 30 Day Post-General Report disclosing additional receipts
totaling \$186,237.12.

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Settlement Agreement
ADR 721 (RAD 14L-17)
Page 1

The Committee filed Miscellaneous Electronic Submissions ("Form 99") dated September 24, 2013 and December 4, 2013 stating that the omission was caused by an error made by an outside vendor during the receipt data import process. The Committee advised that the import error caused the receipts to be dated 11/30/12 and included on the original 2012 Year End Report, rather than correctly dated during the 2012 30 Day Post-General reporting period, and that some were miscoded as unitemized receipt records. The Committee stated that the error was discovered during an annual voluntary PAC audit and that they worked closely with the vendor to improve receipt entry and audit procedures to ensure the accuracy of future reports.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Committee on Letter Carriers Political Education (Letter Carriers Political Action Fund) and Timothy C. O'Malley, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.