



FEDERAL ELECTION
COMMISSION
SECRETARIAT

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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

October 6, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LF*
Director, ADR Office

SUBJECT: ADR 728 Bartlett for Congress and Robert Perry,
Treasurer, Recommendation to Approve Settlement
Agreement

RESOLUTION TERMS: Certify the closure of the Committee's federal account and
work with Commission staff to terminate their political
committee status and reporting obligations with the
Commission; and (b) pay a civil penalty of \$3,500 within
thirty (30) days of the effective date of this agreement.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 728 (RR 14L-12). The ADR Office received this referral from the Office of
General Counsel on June 30, 2014.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred Bartlett for
Congress and Robert Perry, Treasurer (Respondents or the Committee) for failing to
disclose all financial activity on its 2010 July Quarterly, 2010 12. Day Pre-Primary,
2011 April Quarterly, 2011 July Quarterly, 2011 October Quarterly, 2011 Year-End,
and 2012 April Quarterly Reports. The Committee filed Amended 2010 July
Quarterly, Amended 2010 12 Day Pre-Primary, Amended 2011 April Quarterly,
Amended 2011 July Quarterly, Amended 2011 October Quarterly, Amended 2011
Year-End, and Amended 2012 April Quarterly Reports to disclose additional receipts

of \$44,387.81 and additional disbursements of \$78,353.36, which were not disclosed in the original reports.

Respondents contend that incorrect or incomplete figures were reported due to an inexperienced volunteer who was preparing the reports. When the errors or omissions were noted, the Committee contracted with an experienced vendor and had a complete reconciliation done. The Committee then filed amended reports to correct the record.

In addition to this matter, the Committee was audited by the Commission for the 2007-2008 election cycle, and was involved in ADR 571 during the 2009-2010 election cycle. ADR 571 was an audit eligible matter, resulting in an agreement approved in February 2012. The settlement involved remedial terms such as attendance at an FEC conference, designation of a compliance specialist, and development of a compliance manual in addition to a civil penalty of \$5,000. Respondents timely complied with all the terms of the settlement in ADR 571.

The former Congressman lost the 2012 General Election. The Committee wishes to terminate its political committee status.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Bartlett for Congress and Robert Perry, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.