



Federal Election Commission
Washington, DC 20463

FEDERAL ELECTION
COMMISSION
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SENSITIVE

MEMORANDUM

December 1, 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 730 80-20 National Asian American PAC and
Kathleen To, Treasurer, Recommendation to Approve
Settlement Agreement

RESOLUTION TERMS: Participate in an FEC conference; develop and certify
implementation of a compliance operations manual which
includes internal controls consistent with those described in
the Commission's Internal Controls and Political
Committees advisory document (2007) and the Best
Practices for Committee Management (published in the
April 2009 Record, available at
www.fec.gov/pages/brochures/bestpractices.shtml), as well
as a process to track receipt of, and response to,
communications with the Commission and pay a civil
penalty of \$3,700 in four equal payments of \$925.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 730 (RR 14L-07). The ADR Office received this referral on June 30, 2014 from
the Office of General Counsel.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred the 80-20
National Asian American PAC and Kathleen To, Treasurer (the Committee or
Respondents) for failing to disclose all financial information on its 2011 Year-End
and 2012 April Quarterly Reports. Respondents filed Amended 2011 Year-End and

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Amended 2012 April Quarterly Reports that disclosed additional receipts of \$103,518.23 and additional disbursements of \$48,108.51.

Respondents contend that the incomplete reports occurred due to the failure of the small and inexperienced staff to timely organize the information needed to file complete reports by the deadlines. As soon as the inaccuracies were noted, the Committee filed amended reports and provided additional training to staff.

UNCONFIDENTIAL

