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Federal Election Commission
Washington, DC 20463

MEMORANDUM

November 7, 2014

TO: The Commission

THROUGH: Alec Palmer *[Signature]*
Staff Director

FROM: Patricia C. Orrock *[Signature]*
Chief Compliance Officer

Lynn M. Fraser *[Signature]*
Director, ADR Office

SUBJECT: ADR 734 Congressional Leadership Fund and Caleb Crosby, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Certify that a compliance specialist has been designated; certify that a Committee representative participated in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division; and pay a civil penalty of \$1,550.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 734 (RAD 14L-30). The ADR Office received this referral on August 18, 2014.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred the Congressional Leadership Fund and Caleb Crosby, in his official capacity as Treasurer (the Committee or Respondents) for failing to disclose all its financial activity on its 2012 July Quarterly, its 2012 October Quarterly and its 2012 30 Day Post-General Reports. The Committee filed these three original reports on July 15, 2012, October 15, 2012 and December 6, 2012 respectively. Amended 2012 July Quarterly Reports were filed on July 27, 2012 and December 19, 2012 that disclosed additional receipts of \$14,000.00. An Amended 2012 October Quarterly Report was filed on December 19, 2012 that disclosed additional receipts of \$35,000. An Amended 2012 30 Day Post-General Report was also filed on December 19, 2012

Recommendation to Approve
Settlement Agreement
ADR 734 (RAD 14L-30)

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that disclosed additional receipts of \$10,264.18. The aggregate of additional receipts for these three reports is \$59,264.18.

Respondents contend that administrative oversight caused \$55,264.18 of in-kind contributions to not be included in the reports. In addition, a vendor belatedly notified the Committee of a \$4,000 contribution received, and it was included in the Amended 2012 July Quarterly Report filed July 27, 2012. When these omissions were discovered, Respondents took immediate steps to remedy and disclose them and to make changes to their internal procedures.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Congressional Leadership Fund and Caleb Crosby, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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