



FEDERAL ELECTION
COMMISSION
SECRETARIAT

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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

April 10, 2015

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 744 New York State Committee of the Working Families Party and Dorothy Siegel, Treasurer, Resubmitted Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: 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; amend relevant 2009-2010 reports to address any inadequate responses to requests for additional information from RAD within thirty (30) days of the effective date of this agreement; and pay a civil penalty of \$5,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 744 (RAD 14L-37). The ADR Office received this referral on October 29, 2014.

Recommendation to Approve
Settlement Agreement
ADR 744 (RAD 14L-37)
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SUMMARY: The Reports Analysis Division referred the New York State Committee of the Working Families Party and Dorothy Siegel, Treasurer (Respondents or the Committee) for cumulative errors during the 2009-2010 election cycle, which disclosed the Committee was not in substantial compliance with the FECA. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA.

Respondents acknowledge that since the 2009-2010 election cycle, they have taken significant steps to upgrade their finance and compliance processes, including replacing the entire finance and compliance staff. Respondents' compliance processes are now overseen by an experienced Director of Compliance (who has completed FEC training) under the supervision of an experienced Chief Finance Officer. The Committee also upgraded accounting procedures to make the financial processes easier to track and reconcile.

14-00000-0001

RECOMMENDATIONS:

1. Approve the attached settlement agreement of New York State Committee of the Working Families Party and Dorothy Siegel, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.