



Federal Election Commission  
Washington, DC 20463

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**SENSITIVE**

**MEMORANDUM**

July 24, 2015

TO: The Commission

THROUGH: Alec Palmer *EWP/H*  
Staff Director

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

Lynn M. Fraser *LF*  
Director, ADR Office

SUBJECT: ADR 754 Gallego for Arizona and Rebecca Winger,  
Treasurer, 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 (April 2009 Record, available at  
[www.fec.gov/pages/brochures/bestpractices.shtml](http://www.fec.gov/pages/brochures/bestpractices.shtml)), as well  
as a process to track receipt of and response to  
communications with the Commission; certify that a  
representative of the Committee participated in an FEC  
conference, webinar, or other program developed in  
consultation with the FEC's Information Division; and pay  
a civil penalty of \$2,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to  
ADR 754 (RAD 15L-07). The ADR Office received this referral on April 14, 2015.

**SUMMARY:** In this case, the Reports Analysis Division (RAD) referred Gallego  
for Arizona and Rebecca Winger, Treasurer (Respondents or the Committee)  
for failing to disclose all financial activity on their 2014 12 Day Pre-General

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Report. The Committee filed its original 2014 12 Day Pre-General Report on October 23, 2014. On December 4, 2014, January 31, 2015, and February 10, 2015, Respondents filed Amended 2014 12 Day Pre-General Reports that disclosed additional disbursements of \$53,314.07.

Respondents contend, in part, in a memo included with the Amended 2014 12 Day Pre-General Report filed February 10, 2015, the "Committee acknowledges increase in disbursements from original filing . . . which was due to an administrative error. Committee has taken steps to more effectively review and reconcile FEC reports prior to submission in the future." Respondents further contend that to maintain compliance with the FECA, the Committee retained the services of a new compliance consulting firm that has extensive experience with Congressional campaigns, national political committees and Presidential campaigns.

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Gallego for Arizona and Rebecca Winger, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.