



Federal Election Commission  
Washington, DC 20463

2015 AUG -6 AM 9:09

**SENSITIVE**

MEMORANDUM

August 5, 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 770 US Chamber of Commerce Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Certify that Respondents had a representative participate in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division; and pay a civil penalty of \$2,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 770 (RAD 13L-23). The ADR Office received this referral on June 3, 2015.

**SUMMARY:** In this case, the Reports Analysis Division (RAD) referred the US Chamber of Commerce (Respondent) for failing to file a 48-Hour Report to support an independent expenditure. The \$50,000 independent expenditure was disclosed on Respondent's 2014 October Quarterly Report.

Respondent contends that at about the same time as this expenditure was made, the employee who was responsible for initiating the payment and reporting of independent expenditures was in the process of winding down his employment with Respondent. For reasons unknown, the employee made the expenditure but failed to initiate a corresponding 48-Hour Report. Respondent restructured both financial procedures and staffing in response to this omission.

Recommendation to Approve  
Settlement Agreement  
ADR 770 (RAD 15L-23)  
Page 1

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of US Chamber of Commerce.
2. Approve the appropriate letters.
3. Close the file on this matter.