



CONFIDENTIAL

2015 DEC 18 AM 8:40

SENSITIVE

Federal Election Commission
Washington, DC 20463

MEMORANDUM

December 17, 2015

TO: The Commission

THROUGH: Alec Palmer *fp*
Staff Director

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

BY: Lynn M. Fraser *LM*
Director, ADR Office

BY: Krista J. Roche *KJR*
Assistant Director, ADR Office

SUBJECT: ADR 777 Massachusetts Republican Party and Brent J. Andersen, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Certify that the Committee performed reconciliation of the Committee's accounts for each required FEC report for one year; and pay a civil penalty of \$4,500

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 777 (RAD 15L-30). The ADR Office received this referral on August 4, 2015.

SUMMARY: The Reports Analysis Division (RAD) referred Respondents for failing to disclose all financial activity on their 2014 12 Day Pre-General Report. The Committee filed the original report on October 23, 2014. On December 4, 2014, the Committee filed an Amended 2014 12 Day Pre-General Report disclosing additional receipts of \$150,000.

The Committee filed a Miscellaneous Electronic Submission (FEC Form 99) on April 20, 2015, indicating that the Committee discovered the omission during an internal review and immediately filed an amended report to disclose the transfer. The Committee contends the omission was due to a staff miscommunication

during a period of heightened Committee activity. The Committee indicates it has reviewed and improved its process to avoid errors of this nature in the future.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Massachusetts Republican Party and Brent J. Andersen, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.