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Federal Election Commission
Washington, DC 20463

MEMORANDUM

December 14, 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 778 Ohio Republican Party State Central & Executive Committee and Ranae Lentz, Treasurer, ERRATA Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and certify implementation of an updated and revised 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, 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 two FEC conferences, webinars, or other program developed in consultation with the FEC's Information Division; and pay a civil penalty of \$3,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 778 (RAD 15L-31). The ADR Office received this referral on August 25, 2015.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred the Ohio Republican Party State Central & Executive Committee and Ranae Lentz, Treasurer (Respondents or the Committee) for a failure to disclose all financial transactions on its 2014 October Monthly Report. The Committee filed Amended 2014 October Monthly Reports on March 18 and March 26, 2015. The latter report disclosed

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additional receipts of \$70,623.53 from the original 2014 October Monthly Report filed on October 20, 2014.

Respondents contend the amount in question resulted from reimbursements made by one Candidate for payroll expenses not being included in the total receipts. Both the Committee and the Candidate timely disclosed the expenditures by the Committee as in-kind contributions when they were made. When the Candidate later reimbursed the Committee for the expenditure, those reimbursements were disclosed by the Candidate, but due to a software calculation error, the Committee did not disclose the reimbursements among its deposits.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Ohio Republican Party State Central & Executive Committee and Ranae Lentz, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.