



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

March 23, 2016

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TO: The Commission
THROUGH: Alec Palmer *EW/HM*
Staff Director
FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer
Lynn M. Fraser *DJF*
Director, ADR Office
SUBJECT: ADR 788 Conservative Campaign Committee and Kelly
Lawler, 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
(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; (b) 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 (c)
pay a civil penalty of \$4,750.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 788 (RAD 15L-45). The ADR Office received this referral on December 3, 2015.

SUMMARY: The Reports Analysis Division referred the Conservative Campaign Committee and Kelly Lawler, Treasurer (Respondents or the Committee) for cumulative errors during the 2013-2014 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 contend that they are working on resolving some systemic reporting issues by making changes in financial procedures.