



Federal Election Commission  
Washington, DC 20463

2016 OCT -5 PM 1:02

**SENSITIVE**

**MEMORANDUM**

October 6, 2016

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 806 Rodney for Congress and Chris Marston,  
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, 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 \$3,400.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to  
ADR 806 (RAD 16L-11). The ADR Office received this referral on June 28, 2016.

**SUMMARY:** In this case, the Reports Analysis Division (RAD) referred Rodney for  
Congress and Chris Marston, Treasurer for failing to disclose all financial  
transactions on their 2016 12 Day Pre-Primary Report. The Committee filed an

Amended 2016 12 Day Pre-Primary Report on April 15, 2016 that disclosed an additional \$95,059.63 in disbursements.

Respondents contend they filed an Amended 2016 12 Day Pre-Primary Report on April 15, 2016, and included a memo text that stated, in part: "In the process of fixing [an issue with Column B totals on the 2015 Year-End Report] and an error on the [2016] April quarterly report, we learned some disbursements from this period were inadvertently left off the original report. We have fixed this and included all disbursements in this amendment."

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Rodney for Congress and Chris Marston, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.