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Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

May 2, 2017

TO: The Commission

THROUGH: Alec Palmer *awp/for*  
Staff Director

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

Lynn M. Fraser *LMF/KJR*  
Director, ADR Office

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

SUBJECT: ADR 819 National Right to Life Victory Fund and Wayne  
Cockfield, Treasurer, Recommendation to Approve  
Settlement Agreement

RESOLUTION TERMS: Distribute a memorandum to the Committee's reporting  
vendor mandating that documents, specifically including  
bank statements, shall be thoroughly reviewed on the date  
received; and pay a civil penalty of \$3,200.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to  
ADR 819 (RAD 17L-03). The ADR Office received this referral on January 12, 2017.

**SUMMARY:** The Reports Analysis Division (RAD) referred National Right to  
Life Victory Fund and Wayne Cockfield, Treasurer, (Respondents or the  
Committee) for failure to disclose all financial activity on its 2016 July Quarterly  
Report, originally filed on July 15, 2016. On August 1, 2016, the Committee filed  
an Amended 2016 July Quarterly Report disclosing additional disbursements  
totaling \$169,275.62.

In an FEC Form 99 filed on December 18, 2016, the Committee stated that the  
original report was filed based upon information available at the time. The

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Committee contends that when new information became available, the report was immediately amended. In the Form 99 the Committee further states that it "will continue to review its procedures to ensure accurate information is filed in a timely manner."

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of National Right to Life Victory Fund and Wayne Cockfield, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.