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Federal Election Commission
Washington, DC 20463

MEMORANDUM

October 12, 2017

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Krista J. Roche *KJR*
Acting Director, ADR Office

SUBJECT: ADR 828 National Right to Life Political Action
Committee and Wayne Cockfield, Treasurer,
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Designate a compliance specialist; develop and certify
implementation of a compliance operations manual;
conduct an internal education program for staff to discuss
internal controls and distribute the compliance manual; and
pay a civil penalty of \$3,375.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 828 (17L-13). The ADR Office received this referral on May 25, 2017.

SUMMARY: The Reports Analysis Division (RAD) referred Respondents for failing to timely file one (1) 24-Hour Report totaling \$30,000 to support two (2) independent expenditures disclosed on the 2016 30 Day Post-General Report. The Committee filed the missing 24-Hour Report on December 16, 2016.

The Committee contends this error was inadvertent and that some remedial measures have been implemented to prevent errors of this nature from occurring in the future. Specifically, when an expenditure is contemplated, the requesting staff member must not only alert the compliance vendor contemporaneously, but also provide written notification of the expenditure to a second staff member to

Recommendation to Approve
Settlement Agreement
ADR 828 (RAD 17L-13)
Page 1

11-10-2017 11:08 AM

ensure the expenditure is reported properly. During this reporting period, the Committee did report two hundred ninety-three (293) other independent expenditures timely.

