



Federal Election Commission
Washington, DC 20463

MEMORANDUM

October 12, 2017

TO: The Commission

THROUGH: Alec Palmer
Staff Director

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

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

SUBJECT: ADR 833 National Right to Life Victory Fund and Wayne
Cockfield, Treasurer, Recommendation to Approve
Settlement Agreement

RESOLUTION TERMS: Designate a compliance specialist; develop and certify
implementation of a revised 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 \$6,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 833 (RR 17L-12)**. The ADR Office received this referral on July 18, 2017 from the Office of General Counsel.

SUMMARY: The Reports Analysis Division referred Respondents for failing to timely file one (1) 24-Hour Report supporting two (2) independent expenditures totaling \$61,813.59 disclosed on the 2016 30 Day Post-General Report. The Committee filed the missing 24-Hour Report on December 20, 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 ensure the expenditure is reported properly. During this reporting period, the Committee did report three hundred forty-two (342) other independent expenditures timely.

11-10-2012

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.