



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

2018 FEB -5 AM 10:40

**MEMORANDUM**

February 5, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 841 Michigan Democratic State Central Committee  
and Sandy O'Brien, Treasurer, Recommendation to  
Approve Negotiated Settlement

RESOLUTION TERMS: Amend relevant 2015-2016 reports to address any  
inadequate responses and nonresponses to requests for  
additional information from RAD; 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 \$8,600.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 841 (RAD 17L-33). The ADR Office received this referral on September 15, 2017.

**SUMMARY:** RAD referred Michigan Democratic State Central Committee and Sandy O'Brien, Treasurer, (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2015-2016 election cycle. 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. The Committee's reporting errors included, among other items: excessive, prohibited and other impermissible contributions or transfers; mathematical discrepancies, failure to provide supporting schedules; failure to properly itemize contributions

Recommendation to Approve  
Settlement Agreement  
ADR 841 (RAD 17L-33)  
Page 1

and transfers from political committees; failure to properly itemize disbursements; and allocated federal and non-federal activity.

Respondents contend there were reporting challenges during the 2016 election cycle. Respondents further contend that the Committee made procedural changes to ensure future compliance.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Michigan Democratic State Central Committee and Sandy O'Brien, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.