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2018 FEB -5 AM 10:40



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

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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.