



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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MEMORANDUM

January 17, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

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

SUBJECT: ADR 843 American Financial Services Association PAC
and Bill Himpler, Treasurer, Recommendation to Approve
Negotiated Settlement

RESOLUTION TERMS: Perform an annual internal audit and reconciliation for two
years; and pay a civil penalty of \$11,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 843 (AR 17-06). The ADR Office received this referral on September 25, 2017.

SUMMARY: On July 21, 2017, the Commission approved the Final Audit Report for American Financial Services Association PAC and Bill Himpler, Treasurer, (Respondents or the Committee). In Finding 1, the Commission found that Respondents misstated financial activity. Specifically, for calendar year 2013, receipts were misstated by \$10,080.78 and disbursements were misstated by \$67,904.92. In addition, Respondents failed to disclose \$310,683 in receipts on original reports filed during the 2014 election cycle.

Respondents filed amended reports on January 13, 2016. However, these amendments did not correct the misstatements for receipts and disbursements in calendar year 2013. With regard to the failure to disclose receipts on original reports during the 2014 election cycle, Respondents filed amendments disclosing all but \$11,255 of those receipts. Respondents indicate that the Committee retained a new preparer of its FEC reports since the errors in question occurred and implemented new procedures to ensure the accuracy of filed reports.

Recommendation to Approve
Settlement Agreement
ADR 843 (AR 17-06)
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RECOMMENDATIONS:

1. Approve the attached negotiated settlement of American Financial Services Association PAC and Bill Himpler, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.