



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2018 FEB 28 AM 10:26

SENSITIVE

MEMORANDUM

February 28, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

SUBJECT: ADR 846 Rohrabacher for Congress and Jen Slater,
Treasurer, Recommendation to Approve Negotiated
Settlement

RESOLUTION TERMS: Develop and certify implementation of internal controls
consistent with those described in the Commission's Internal
Controls and Political Committees advisory document
(2007) and the Best Practices for Committee Management;
and provide confirmation that the internal control procedures
have been followed consistently one (1) year from the
effective date of this agreement.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 846 (RR 16L-06). The Commission voted to transfer this matter from the Office of General Counsel to the ADR Office on March 21, 2017.

SUMMARY: RAD referred Rohrabacher for Congress and Jen Slater, Treasurer (Respondents or the Committee) for failing to disclose all financial activity. The Committee filed amended reports for reporting periods in 2013, 2014, and 2015 revealing, in total, \$39,095.79 of deposits from the former treasurer and \$226,425.48 in unauthorized disbursements.

In its July 2016 Response to the Referral, the Committee explained that it made internal changes to prevent future embezzlement. The Committee opened a new bank account, hired a well-regarded campaign reports specialist to take over as

treasurer, and "implemented review of the Committee's reports in accordance with the Commission's recommendations of methods to prevent unauthorized withdrawals of committee funds."

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Rohrabacher for Congress and Jen Slater, Treasurer.
2. Approve the appropriate letters.

3. Close the file on this matter.