



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 14, 2018

Charles Bell
455 Capitol Mall Suite 600
Sacramento, CA 95814

Re: ADR 846
Rohrabacher for Congress and Jen Slater, Treasurer

Dear Charles Bell:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-
shown matter. The Negotiated Settlement was approved by the Commission on
3/8/2018 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please
forward to this office, a statement confirming Respondent's compliance with each term.
The letter should note the dates on which Respondents satisfied each of the terms and
contain the ADR case number. For your convenience, a compliance chart is attached.

As you are aware, the Negotiated Settlement will be made part of the record that
is released to the public. The Commission will also place on the record copies of the
complaint/referral, correspondence exchanged between your office and this office prior
to our negotiations, and reports prepared for the Commission by this office to assist in
its consideration of this matter. The Commission is obliged by Federal statute to place
on the public record documents in closed enforcement and alternative dispute resolution
cases; accordingly, copies of documents relative to this matter will be forwarded shortly
to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively
resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

Krista J. Roche

Krista J. Roche
Director
Alternative Dispute Resolution Office

Enc: Compliance Chart
Negotiated Settlement



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WASHINGTON, D.C. 20463

Case Number: ADR 846

Source: RR 16L-06

Case Name: Rohrabacher for Congress

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Charles H. Bell, Esq., representing Rohrabacher for Congress and Jen Slater, in her official capacity as Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Reports Analysis Division referred Respondents 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 in deposits from the former treasurer and \$226,425.48 in unauthorized disbursements.
4. Treasurers of political committees are required to report all financial activity, including all receipts and disbursements, pursuant to the FECA. 52 U.S.C. §§ 30104(b)(2) and (4), 11 C.F.R. §§ 104.3(a) and (b).
5. The Committee contends 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."
6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) 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 (published in the April 2009 Record, available at www.fec.gov/pages/brochures/bestpractices.shtml) within thirty (30) days of the effective date of this agreement; and (b) provide confirmation that the internal control procedures have been followed consistently one (1) year from the effective date of this agreement.

7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
 8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
 9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraph 6 above, and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
 10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 846 (RR 16L-06), and resolves those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

**Krista J. Roche, Director
Alternative Dispute Resolution Office**

Mr Rock

3/14/18
Date Signed

Date Signed

FOR THE RESPONDENTS:

Charles N. Bell

Charles H. Bell, Esq.
Representing Rohrabacher for Congress
and Jen Slater, Treasurer

January 22, 2018
Date Signed