



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION

2018 SEP -6 AM 10:00

**SENSITIVE**

**MEMORANDUM**

September 6, 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 865 Rights & Democracy Action and Peri Stockinger,  
Treasurer, Recommendation to Approve Negotiated  
Settlement

RESOLUTION TERMS: Pay a civil penalty of \$1,250 and work with Commission  
staff to terminate political committee status and reporting  
obligations.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 865 (RAD 18L-07). The ADR Office received this referral on February 5, 2018.

**SUMMARY:** The Reports Analysis Division referred Rights & Democracy Action and Peri Stockinger, Treasurer (Respondents or the Committee) for failing to file two (2) 24-Hour Reports totaling \$31,191.02 to support four (4) independent expenditures disclosed on the Amended 2016 30 Day Post-General Report.

The Committee contends that it attempted to file a report detailing independent expenditures using FEC Form 5, but the report was not accepted because registered political committees are required to file using FEC Form 3X. Additionally, the Committee contends there was internal confusion regarding the independent expenditure activity because the Committee was originally a 501(c)(4) organization. On October 25, 2017, the Committee filed a 24-Hour Report covering these expenditures.

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**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Rights & Democracy Action and Peri Stockinger, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.