



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

**MEMORANDUM**

November 30, 2018

**TO:** The Commission

**THROUGH:** Alec Palmer *AP by MAM*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

**SUBJECT:** ADR 880 Massachusetts Democratic State Committee and Paul Yorkis, Treasurer, Recommendation to Approve Negotiated Settlement

**RESOLUTION TERMS:** Perform required corrective action in accordance with the Corrective Action Plan (Exhibit A of the Negotiated Settlement); complete training in accordance with the Training Plan (Exhibit B of the Negotiated Settlement); and pay a civil penalty of \$7,050.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 880 (AR 2-749). The ADR Office opened this matter on July 18, 2018.

**SUMMARY:** Audit fieldwork of the Committee's 2014 election cycle activity showed that Respondents failed to disclose debts and obligations in the amount of \$267,410.

Respondents contend that most of the debts (\$215,648 of the \$267,410) were paid within twenty (20) days or less, and due to the tight filing deadline requirements for the pre and post-general reports, debt reporting requirements were triggered during a short timeframe. Respondents contend that in every instance, the debts

Recommendation to Approve  
Negotiated Settlement  
ADR 880 (AR 2-749)  
Page 1

2018 DEC -3 AM 10:28  
RECEIVED  
FEDERAL ELECTION COMMISSION

10-10-18-11-18-2018

were related to the pre and post-general reporting periods, and all debts were paid by the next reporting period.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Massachusetts Democratic State Committee and Paul Yorkis, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.