



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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2019 MAR -4 AM 9:49

SENSITIVE

MEMORANDUM

March 1, 2019

TO: The Commission

THROUGH: Alec Palmer *AP*
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 888 Marijuana Policy Project PAC and Don Murphy,
Treasurer, Recommendation to Approve Negotiated
Settlement

RESOLUTION TERMS: Pay a civil penalty of \$4,000 and work with Commission
staff to terminate political committee status and reporting
obligations.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 888 (RAD 18L-31). The ADR Office received this referral on September 18, 2018.

SUMMARY: The Reports Analysis Division referred Marijuana Policy Project PAC and Don Murphy, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2017 Mid-Year Report, filed on August 11, 2017. On April 15, 2018, the Committee filed an Amended 2017 Mid-Year Report including \$143,129.99 in additional disbursements.

Respondents filed a Form 99 (Miscellaneous Electronic Submission) on July 3, 2018, indicating that they discovered various transactions, including a few large transfers, between the Committee and the connected organization after the previous treasurer stepped down as Executive Director of the Committee's connected organization and was removed from his position as treasurer of the Committee.

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Additionally, the Respondents stated that immediately upon discovery, the new staff at the Committee undertook a full review of the Committee's records and prepared amendments to correct the public record. In discussions with the ADRO, Respondents indicate that they wish to terminate the Committee's reporting obligations because there has been no activity for the past year. However, Respondents also state they may establish a new Committee at some point in the future.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Marijuana Policy Project PAC and Don Murphy, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.