



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2019 SEP 17 PM 12:47

**SENSITIVE**

**MEMORANDUM**

September 17, 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 914 Idaho State Democratic Party (C00010439)  
Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Certify that a representative participates in an FEC training program and pay a civil penalty of \$4,525.00.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 914 (RR 18L-21). The ADR Office received this referral from the Office of General Counsel (OGC) on May 2, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred the Idaho State Democratic Party and LeRoy Hayes, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2016 June Monthly Report, originally filed on June 20, 2016. On August 20, 2018, the Committee filed an Amended 2016 June Monthly Report including \$99,050.03 in additional receipts and \$99,768.01 in additional disbursements<sup>1</sup>.

Respondents state that the failure to report the transactions was due to inadvertent oversight during the initial preparation of the report. The Committee further states

<sup>1</sup> The RAD referral discloses amounts from the Amended 2016 June Monthly Report, filed on April 9, 2017. The Committee filed an additional amendment on August 20, 2018 after the referral was transferred for further enforcement.

that the errors were not immediately self-evident because they caused no net change to the cash on hand balance.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Idaho State Democratic Party and LeRoy Hayes, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.