



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2019 AUG 29 AM 10:24

**SENSITIVE**

**MEMORANDUM**

August 29, 2019

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: ADR 915 Massachusetts Democratic State Committee  
(C00089243)  
Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Certify the implementation of a compliance operations manual and pay a civil penalty of \$8,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 915 (RR 18L-19). The ADR Office received this referral from the Office of General Counsel (OGC) on May 2, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred Massachusetts Democratic State Committee and Paul G. Yorkis, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2016 September Monthly Report, originally filed on September 20, 2016. On December 10, 2017, the Committee filed an Amended 2016 September Monthly Report including \$260,001.53 in additional receipts.

Respondents state that the failure to report these transactions was in no way intentional, was caused by an inadvertent data entry error, and an amended report was filed immediately upon discovery of the errors. The Committee further states

that a new compliance officer, who is familiar with FEC reporting procedures, has since been hired.

### **RECOMMENDATIONS:**

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

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