



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2019 DEC 18 PM 4:25

**SENSITIVE**

**MEMORANDUM**

December 19, 2019

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP by MAH*

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

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 925 – Massachusetts Republican Party and  
Brent Andersen, Treasurer

RESOLUTION TERMS: Certify that a representative of the Committee participated  
in an FEC training program; and pay a civil penalty of  
\$5,450.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 925 (RAD 19L-22). The ADR Office received this referral on August 2, 2019.

**SUMMARY:** The Reports Analysis Division referred the Massachusetts Republican Party and Brent Anderson, Treasurer (Respondents or the Committee) for failing to disclose newly incurred debts on its 2018 12-Day Pre-General Report, originally filed on October 24, 2018. On March 20, 2019, the Committee filed an Amended 2018 12-Day Pre-General Report including \$108,663.84 in newly incurred debts that were not disclosed on the original report.

Respondents state that they conducted an internal audit and found that the prior compliance and accounting firm did not include the debt in the original report. Once the Committee discovered the error, they notified the prior

compliance firm and instructed them to file an amendment with the additional incurred debt. Additionally, Respondents state that they have since taken further remedial measures, which include changing the accounting and compliance firm utilized by the Committee, and tracking and discussing payables on a weekly basis.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Massachusetts Republican Party and Brent Andersen, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.