



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

January 30, 2020

TO: The Commission

THROUGH: Alec Palmer *AP by MAH*
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: Recommendation to Approve Negotiated Settlement
ADR 933 — New Jersey Republican State Committee
(C00164418) and April Bengivenga, Treasurer

RESOLUTION TERMS: Complete training in accordance with the Training Plan
(Exhibit A of the Negotiated Settlement); redevelop and
recertify implementation of a process to track receipt of, and
response to, communications with the Commission; and pay
a civil penalty of \$5,030.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 933
(RAD 19L-33). The ADR Office received this referral on September 13, 2019.

SUMMARY: The Reports Analysis Division (RAD) referred the New Jersey
Republican State Committee (Respondents or the Committee) for a series of
reporting errors and other FECA violations during the 2017-2018 election
cycle. The Committee's errors included, among other items: mathematical
discrepancies, failure to properly itemize disbursements, Federal Election
Activity/Levin Funds, and Allocated Federal and Non-Federal Activity.

During negotiations, the Committee filed amended reports to address the
2017-2018 election cycle reporting errors. RAD reviewed the filings and

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determined that no further corrective action is required. The Committee states that it is dedicated to enhancing its compliance efforts to ensure accurate reporting in the future.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of New Jersey Republican State Committee and April Bengivenga, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.