



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
SECRETARIAT

2020 FEB 13 AM 9:11

**SENSITIVE**

**MEMORANDUM**

February 13, 2020

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP*

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 938 - Massachusetts Democratic State Committee  
(C00089243) and Paul G. Yorkis, Treasurer

RESOLUTION TERMS: Complete training in accordance with the Training Plan  
(Exhibit A of the Negotiated Settlement); develop and  
certify implementation of a process to track receipt of, and  
response to, communications with the Commission; and pay  
a civil penalty of \$5,550.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 938 (AD A19-12). The ADR Office received this referral on September 30, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred and the Audit Division transferred the Massachusetts Democratic State Committee and Paul G. Yorkis, Treasurer (the Committee or Respondents) for a series of reporting errors and other FECA violations during the 2017-2018 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's reporting errors included, among other items: excessive,

Recommendation to Approve  
Negotiated Settlement  
ADR 938 (AD A19-12)  
Page 1

prohibited and other impermissible contributions or transfers, mathematical discrepancies, Federal Election Activity/Levin Funds, and allocated Federal and Non-Federal activity.

In response to the referral, the Committee filed amendments to correct the public record for the 2017-2018 election cycle reporting errors. RAD reviewed these amendments and determined that no further corrective action is required.

**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.