



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

July 26, 2011

TO: The Commission

THROUGH: Alec Palmer
Acting Staff Director *AP*

FROM: Patricia Carmona *PC*
Chief Compliance Officer

Lynn M. Fraser *LMF/KR*
Director, ADR Office

SUBJECT: ADR 574 Mid-Atlantic Laborers' Political League – Laborers' International Union of N.A. and Justin Meighan, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Send a representative to a FEC conference; develop and implement a compliance operations manual which includes internal controls consistent with the Commission's Internal Controls Policy (2007) and a process to track receipt of, and response to, communications with the Commission; and pay a civil penalty of \$1,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 574 (RAD 11L-13). The ADR Office received this referral on May 18, 2011.

SUMMARY: In this case, the Reports Analysis Division referred the Mid-Atlantic Laborers' Political League – Laborers' International Union of N.A. and Justin Meighan, Treasurer (Respondents) for failing to disclose all financial activity on their 2010 October Quarterly Report. Respondents filed an amended 2010 October Quarterly Report on January 11, 2011 that disclosed additional disbursements of \$65,000.

Respondents contend that while updating their software, three transactions got lost in the process. Respondents further contend that one transaction was to a federal candidate, and the other two transactions were to state office candidates.

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RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Mid-Atlantic Laborers' Political League – Laborers' International Union of N.A. and Justin Meighan, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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