



Federal Election Commission
Washington, DC 20463

September 19, 2013

Robert Lee Little, III
Friends of Anna Little
P.O. Box 382
Highlands, NJ 07732

Re: ADR 635 (MUR 6588)
Friends of Anna Little and Robert Lee Little, III, Treasurer

Dear Mr. Little:

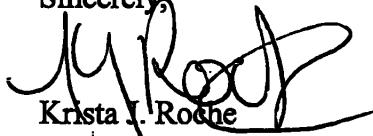
Enclosed is the signed copy of the Negotiated Settlement resolving complaint filed on May 29, 2012 with the Federal Election Commission ("FEC/Commission") against the above-shown Respondents. The Negotiated Settlement was approved by the Commission on September 19, 2013—the effective date of the agreement.

Note the specific time frames for compliance in Paragraph 6 of the agreement. **Please forward to this office, a statement confirming Respondent's compliance with the terms listed in the aforementioned agreement.** The letter should note the dates on which Respondents satisfied each of the terms listed in Paragraph 6, and contain the ADR caption and case number. **The civil penalty payment should be sent to the attention of the Accounting/Finance Office of the FEC. The civil penalty under the agreement is due on or before March 19, 2014. Please put the ADR case number on the civil penalty check as well, to ensure crediting to the correct case.**

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

This agreement resolves the matter that was brought to the attention of the FEC by Charles Measley regarding an alleged violation of the federal election campaign laws. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,



Krista J. Roche
Assistant Director

Alternative Dispute Resolution Office

Enc: Negotiated Settlement

cc: Gwendolyn Holmes, Finance and Accounting Office

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Washington, DC 20463**

Case Number: ADR 635
Source: MUR 6588
Case Name: Friends of Anna Little

NEGOTIATED SETTLEMENT

This matter was initiated by a signed, sworn and notarized complaint filed by Charles Measley. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Federal Election Commission (Commission) entered into negotiations with Robert Lee Little, III representing Friends of Anna Little and himself, in his official capacity as Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this complaint. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 2 U.S.C. § 437g.
2. Respondents voluntarily enter into this agreement with the Commission.
3. Charles Measley filed a complaint dated May 29, 2012, alleging that Respondents failed to file reports for Anna Little's 2012 Congressional campaign as well as her prior Senatorial campaign for the same cycle. At the time the complaint was written, no reports were filed except a February, 2012, Statement of Organization. On June 1, 2012, Respondents filed a report disclosing \$161,152 in receipts and \$147,317 in disbursements from the period beginning January 1, 2011 and ending March 31, 2012, a total of \$308,469 in previously undisclosed financial activity.
4. Each principal campaign committee shall file a Statement of Organization no later than ten days after designation pursuant to 11 C.F.R. § 101.1(a). 2 U.S.C. § 441d, 11 C.F.R. § 110.11. Within fifteen days of becoming a candidate, an individual must file a Statement of Candidacy with the Commission that designates the candidate's principal campaign committee. 2 U.S.C. § 432(e)(1). Treasurers of political committees are required to report all financial activity, including all receipts,

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disbursements, and debts, pursuant to the FECA, 2 U.S.C. §§ 434(b)(2), (4), and (8), 11 C.F.R. §§ 104.3(a), (b), and (d).

5. Respondents contend that reports were not timely filed due to redistricting issues. Respondents contend that the candidate was unsure whether she would run for office, and if so in what district she would run, due to a late decision on redistricting. In addition, Respondents contend that issues in conjunction with Hurricane Sandy prevented the filing of reports near the election. Respondents acknowledge that the former treasurer made mistakes. Respondents have since replaced the Treasurer and hired an experienced professional.
6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) send a representative to an FEC seminar within twelve (12) months of the effective date of this agreement; (b) develop and certify implementation of a compliance operations manual which includes internal controls consistent with the Commission's Best Practices for Committee Management (2009 update) and a process to track receipt of, and response to, communications with the Commission within sixty (60) days of the effective date of this agreement; (c) continue to retain outside an compliance vendor to review reports for a period of two years from the effective date of this agreement, providing annual certification of that review on the anniversary of the effective date of this agreement each year (2014 and 2015); and (d) pay a civil penalty of \$6,500 within six (6) months of the effective date of this agreement.
7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraph 6 above, and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 635 (MUR 6588), and resolves those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.


FOR THE COMMISSION:

Krista J. Roche, Assistant Director
Alternative Dispute Resolution Office



Date Signed

FOR THE RESPONDENTS:



Robert Lee Little, III
Representing Friends of Anna Little and
Robert Lee Little, III, Treasurer



Date Signed

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