



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

May 29, 2014

TO: The Commission

THROUGH: Alec Palmer *APC*
Staff Director

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

Lynn M. Frasek *LMF*
Director, ADR Office

SUBJECT: ADR 676 American Bridge 21st Century and Rodell Mollineau, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Certify that a representative of the Committee participated in an FEC conference; 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; and pay a civil penalty of \$6,200.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 676 (RAD 13L-55). The ADR Office received this referral on December 31, 2013.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred American Bridge 21st Century and Rodell Mollineau, Treasurer ("Respondents or the Committee) for failing to disclose all financial activity on their 2011 Year-End Report. The Committee filed the original 2011 Year-End Report on January 31, 2012. Respondents filed Amended 2011 Year-End Reports on April 13, 2012, May 24, 2012 and July 30, 2013 that disclosed additional debts of \$360,060.70.

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Respondents acknowledge an inadvertent omission of some Committee debt in the original 2011 Year End Report. Respondents contend that they discovered the reporting discrepancy themselves through their routine compliance efforts, that they promptly amended the report at issue to disclose the additional debt upon discovery, and that it was their effort to self-correct that prompted the referral.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of American Bridge 21st Century and Rodell Mollineau, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.