



FEDERAL ELECTION
COMMISSION
SECRETARIAT

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SENSITIVE

Federal Election Commission
Washington, DC 20463

MEMORANDUM

June 2, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

BY: Krista J. Roche *KJR*
Assistant Director, ADR Office

SUBJECT: ADR 693 Citizens United Political Victory Fund and Kevin Allen, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual and pay a civil penalty of \$4,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 693 (RR 13L-31). The ADR Office received this referral on January 15, 2014.

SUMMARY: The Reports Analysis Division referred Citizens United Political Victory Fund and Kevin Allen, Treasurer (Respondents or the Committee) for failing to disclose all financial activity. The Committee amended its 2010 30 Day Post-General, 2011 March Monthly, 2011 June Monthly, 2012 October Monthly, and 2012 12 Day Pre-General Reports to disclose additional receipts of \$5,561.50 and additional disbursements of \$127,511.07, which were not disclosed on the original reports.

Respondents contend that the reporting errors in question were all discovered and corrected within two months of the original filing, without prompting by the Commission. Respondents contend that inadvertent data entry omissions, oversight of a transaction during reconciliation, and unavailability of bank statements prior to filing deadlines contributed to the errors.

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Settlement Agreement
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RECOMMENDATIONS:

1. Approve the attached settlement agreement of Citizens United Political Victory Fund and Kevin Allen, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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