



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

June 25, 2014

TO: The Commission

THROUGH: *PCO*
Alec Palmer
Staff Director

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

Lynn M. Fraser
Director, ADR Office

SUBJECT: ADR 714 American Principles in Action, Recommendation
to Approve Settlement Agreement

RESOLUTION TERMS: Certify that counsel has been retained for one year to
review all broadcast advertisements and the filing of FEC
reports; recertify the continued retention of counsel to
review advertisements and the filing of FEC reports for a
second year; and pay a civil penalty of \$3,700.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 714 (RR 14L-04). The ADR Office received this referral from the Office of
General Counsel on April 11, 2014.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred
Respondent for failing to file two (2) 48-Hour Reports totaling \$74,496.50 to
support eight (8) independent expenditures disclosed on the 2012 October
Quarterly Report. On October 11, 2012, Respondent filed a 2012 October
Quarterly Report disclosing nine (9) independent expenditures totaling \$75,305 in
opposition to one (1) federal candidate on the Schedule 5-E. Eight (8) of the
independent expenditures were required to be disclosed on two (2) 48-Hour
Reports.

Respondent stated, in the Miscellaneous Document Submission ("Form 99") filed
on January 13, 2014, "[t]he individual who was responsible for filing APIA's

Recommendation to Approve
Settlement Agreement
ADR 714 (RR 14L-04)
Page 1

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FEC reports left the organization shortly after filing the October Quarterly Report in 2012. The officer responsible for supervising this individual also left the organization around the same time. The recordkeeping was in disarray upon the departure of these two individuals, making it difficult for APIA to determine why the 48-hour reports were not filed."

RECOMMENDATIONS:

1. Approve the attached settlement agreement of American Principles in Action.
2. Approve the appropriate letters.
3. Close the file on this matter.

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