



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

March 16, 2015

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

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

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

SUBJECT: ADR 743 New Hampshire Democratic Party and Brian Rapp, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Designate a compliance specialist; amend relevant 2009-2010 reports to address any inadequate responses to requests for additional information; and pay a civil penalty of \$4,375.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 743 (RAD 14L-36). The ADR Office received this referral on October 29, 2014.

SUMMARY: The Reports Analysis Division referred Respondents for a series of reporting errors and other FECA violations during the 2009-2010 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA.

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Respondents acknowledge reporting challenges during the 2010 election cycle. Respondents contend that the Committee made significant enhancements to its financial policies to ensure future compliance, including the appointment of a new treasurer and hiring counsel experienced in campaign finance and reporting.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of the New Hampshire Democratic Party and Brian Rapp, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.