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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

June 2, 2015

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 747 Nebraska Democratic Party and Gerry Finnegan,
Treasurer, Recommendation to Approve Settlement
Agreement

RESOLUTION TERMS: Conduct internal training focused on coordinated party
expenditures and pay a civil penalty of \$2,950.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 747 (AR 14L-02). The ADR Office received this referral on January 15, 2015.

SUMMARY: On October 23, 2014, the Commission approved the Final Audit
Report for the 2010 election cycle for the Nebraska Democratic Party and Gerry
Finnegan, Treasurer, (Respondents or the Committee), which included a finding
that the Committee exceeded the coordinated party expenditure limit by \$29,615.

Respondents contend that the expenditures in question were for advertisements
originally reported as federal election activity. Respondents indicate that this
misreporting occurred due to a miscommunication with the candidate campaign.
As part of its response to the Interim Audit Report, the Committee materially

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amended its disclosure reports to classify these expenditures as coordinated party expenditures

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Nebraska Democratic Party and Gerry Finnegan, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.