



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

FEDERAL ELECTION
COMMISSION
SECRETARIAT

2009 MAR -3 P 4: 50

SENSITIVE

MEMORANDUM

March 3, 2009

TO: The Commission

THROUGH: Joseph F. Stoltz *JFS*
Acting Staff Director

FROM: John D. Gibson *JDG*
Chief Compliance Officer

Lynn M. Fraser *LMF*
Acting Director, ADR Office

SUBJECT: ADR 466 Massachusetts Democratic State Committee – Fed Fund and Eric Turner, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Certified annual reconciliation of all financial records for 3 years; develop and maintain a written financial activity flowchart for receipts and disbursements; contract with a compliance specialist to review all reports; develop and implement an internal controls policy; and send a representative to FEC training.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 466 (RAD 08L-28). This case was activated by the ADR Office on August 1, 2008.

SUMMARY: In this case, RAD referred the Massachusetts Democratic State Committee – Fed Fund and Eric Turner, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2006 June Monthly Report. Respondents filed their original 2006 June Monthly Report on June 20, 2006. Subsequently, Respondents filed an amended 2006 June Monthly Report on February 1, 2008 that disclosed \$60,000 in transfers from its non-federal account for allocated activity.

Respondents contend that the omission consisted of a single non-federal transfer. When it was discovered, in addition to filing the amendment, the Committee did a complete reconciliation of financial records to reports filed with the Commission from January 2004 to the present, and filed 38 amended reports to ensure the record is complete and accurate.

Recommendation to Approve
Settlement Agreement
ADR 466 (RAD 08L-28)
Page 1

29190281015

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Massachusetts Democratic State Committee – Fed Fund and Eric Turner, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

29190281016