



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James Bopp, Jr., Esq.
The Bopp Law Firm
1 South Sixth Street
Terre Haute, IN 47807

MAY 17 2013

RE: MUR 6670
National Right to Life PAC and Joseph M.
Landrum in his official capacity as
treasurer

Dear Mr. Bopp:

On May 15, 2013, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in black ink that reads "Delbert K. Rigsby". The signature is written in a cursive, slightly slanted style.

Delbert K. Rigsby
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 6670
National Right to Life PAC and Joseph M. Landrum)
in his official capacity as treasurer)

OFFICE OF GENERAL
COUNSEL

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FEDERAL ELECTION
COMMISSION

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission") pursuant to information obtained in the normal course of carrying out its supervisory responsibilities. Based on an audit of National Right to Life PAC for the time-period of 2007-2008, the Commission found reason to believe National Right to Life PAC and Joseph M. Landrum in his official capacity as treasurer ("Respondents" or "NRTL PAC") violated 2 U.S.C. § 434(b).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

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IV. The pertinent facts in this matter are as follows:

1. The NRTL PAC is a separate segregated fund.
2. Joseph M. Landrum is the treasurer of NRTL PAC.
3. The Federal Election Act of 1971, as amended (the "Act") requires

treasurers to file reports disclosing the amount of cash-on-hand at the beginning and end of each reporting period; the total amount of receipts for the reporting period and for the calendar year; and the total amount of disbursements for the reporting period and for the calendar year. See 2 U.S.C. § 434(b) (1), (2), and (4).

4. NRTL PAC did not comply with the Act's reporting requirements when it overstated beginning cash-on-hand by \$130,932, understated receipts by \$29,624, and overstated ending cash-on-hand by \$104,632 in 2007; and when it overstated disbursements by \$1,437,635 and understated cash-on-hand by \$1,300,378 in 2008.

5. The Commission's audit verified that the bulk of the overstatement of disbursements in 2008 resulted from NRTL PAC reporting disbursements for independent expenditures twice. Prior to disseminating the independent expenditures, NRTL PAC reported advance payments to its printing vendor on Schedule B, line 21b. Once it disseminated the materials, NRTL PAC properly reported the expenditures on Schedule E, but failed to subtract the previously reported advances, substantially inflating total disbursements by reporting those disbursements twice, once on Schedule B and again on Schedule E.

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6. Based on a comparison of bank records with the original reports it filed with the Commission in 2007 and 2008, NRTL PAC overstated disbursements by \$687,536.

7. In response to the Interim Audit Report's recommendation, NRTL PAC amended its reports to properly disclose 2007 and 2008 activity.

V. Respondents violated 2 U.S.C. § 434(b) by failing to accurately report receipts, disbursements, and cash-on-hand.

VI. 1. Respondents will pay a civil penalty in the amount of Forty Thousand Dollars (\$40,000) pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. Respondents will cease and desist from violating 2 U.S.C. § 434(b).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

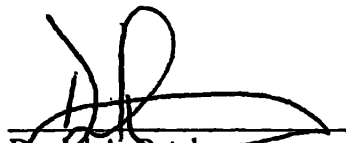
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X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

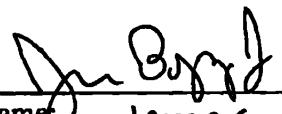
Anthony Herman
General Counsel

BY:


Daniel A. Petalas
Associate General Counsel
for Enforcement

5/17/13
Date

FOR THE RESPONDENT:


Name: James Bopp Jr.
Position: Attorney for
National Right to Life PAC

4/29/13
Date

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