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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

August 2, 2021

TO: The Commission

THROUGH: Alec Palmer AP by *KAH*  
Staff Director

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

Krista J. Roche *PCO for KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1000 - International Brotherhood of Boilermakers  
Campaign Assistance Fund (C00005157)  
and William T. Creeden, Treasurer

RESOLUTION TERMS: Certify that a representative participated in an FEC training  
program; and pay a civil penalty of \$5,140.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1000 (RAD 21L-08). The ADR Office received this referral on March 16, 2021.

**SUMMARY:** The Reports Analysis Division (RAD) referred International Brotherhood of Boilermakers Campaign Assistance Fund and William T. Creeden, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2020 August Monthly Report, originally filed on August 18, 2020. On November 25, 2020, the Committee filed an Amended 2020 August Monthly Report including \$159,492.93 in additional receipts.

Respondents state, as previously detailed in Form 99s (Miscellaneous Electronic Submissions) filed on February 19, 2021 and March 4, 2021, that the Committee's offices were unexpectedly closed due to the COVID-19 virus and they were unable to access the necessary data to file the report. The Respondents state that

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amendments were filed in consultation with their third party compliance consultant as soon as they were able to retrieve the records and verify the information.. Respondents additionally state that the Committee has since implemented a process to access electronic payroll contribution data in the event of a physical office closure.

During negotiations, ADR recommended that Respondents participate in an FEC conference or webinar. Respondents certified that a representative of the Committee participated in an FEC webinar on July 14, 2021.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of International Brotherhood of Boilermakers Campaign Assistance Fund and William T. Creeden, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.