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**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

August 12, 2021

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

Joshua A. Rebollozo *JAR*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1005 - Our Voice Our Vote Arizona PAC and Ryan  
Johnson, Treasurer (C00752576)

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual which includes internal controls as well as a process to track receipt and response to communications with the Commission; certify that a compliance representative and the chairman of the Committee participated in an FEC training; and pay a civil penalty of \$8,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1005 (RAD 21L-12). The ADR Office received this referral on April 2, 2021.

**SUMMARY:** The Reports Analysis Division (RAD) referred Our Voice Our Vote Arizona PAC and Ryan Johnson, Treasurer (Respondents or the Committee) for failing to timely file three (3) 48-Hour Reports totaling \$119,282.46 to support six (6) independent expenditures disclosed on the 2020 October Quarterly Report and for failing to timely file one (1) 48-Hour Report totaling \$49,943.14 to support two (2) independent expenditures disclosed on the 2020 12-Day Pre-General Report.

During negotiations, the Committee stated that it failed to timely file the 48-Hour Reports due to a misinterpretation of reporting requirements. Further, the Committee notes that it believed the expenditures in question had been adequately reported in the Committee's regularly scheduled reports.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Our Voice Our Vote Arizona PAC and Ryan Johnson, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.