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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

August 19, 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 1010 - Conservatives Acting Together Political Action Committee (CATPAC) and David Satterfield, Treasurer (C00518779)

RESOLUTION TERMS: Develop and certify the implementation of a policy document detailing procedures to ensure timely and accurate reporting of independent expenditures; retain an outside consultant to review its compliance procedures and conduct an on-site training; and pay a civil penalty of \$6,100.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1010 (RAD 21L-16). The ADR Office received this referral on April 23, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred Conservatives Acting Together Political Action Committee (CATPAC) and David Satterfield, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$122,094.32 to support one (1) independent expenditure disclosed on the 2020 12-Day Pre-General Report.

On January 7, 2021, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that the 48-Hour Report had been prepared timely but was

inadvertently not filed timely. The Committee noted during negotiations that it filed the missing 48-Hour Report, albeit untimely, and implemented a digital reminder system to track reporting deadlines to ensure that future reports are timely filed.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Conservatives Acting Together Political Action Committee (CATPAC) and David Satterfield, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.