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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

August 24, 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

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1011 - Anna Paulina Luna for Congress (C00718239)
and David Satterfield, Treasurer

RESOLUTION TERMS: All staff responsible for preparing and filing reports will attend a training led by the filing software vendor; and pay a civil penalty of \$2,800.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1011 (RAD 21L-17). The ADR Office received this referral on April 23, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred Anna Paulina Luna for Congress and David Satterfield, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their original 2020 12-Day Pre-General Report, filed on October 22, 2020. On December 2, 2020, the Committee filed an Amended 12-Day Pre-General Report to disclose additional receipts totaling \$51,833.15.

In memo text on the Amended 12-Day Pre-General Report, filed on December 2, 2020, and a Form 99 (Miscellaneous Electronic Submission) filed on January 11, 2021, the Committee states that the omission of receipts was caused by a technical glitch during importation of the donor information into the software used by the

Committee. The Committee states that they worked with the software vendor to correct the error and filed the amendment the same day the issue was discovered.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Anna Paulina Luna for Congress and David Satterfield, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.