

**RECEIVED**

By Office of the Commission Secretary at 4:10 pm, Aug 24, 2021



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 1012 - Independent Alaska (C00757294)  
and Susanna Orr, Treasurer

RESOLUTION TERMS: Develop and certify the implementation and distribution of a policy document to be provided to external compliance vendors detailing independent expenditure reporting procedures; and pay a civil penalty of \$2,800.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1012 (RAD 21L-18). The ADR Office received this referral on April 23, 2021.

**SUMMARY:** The Reports Analysis Division (RAD) referred Independent Alaska and Susanna Orr, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its original 2020 12-Day Pre-General Report, filed October 22, 2020. On January 8, 2021, the Committee filed an Amended 12-Day Pre-General Report to disclose newly incurred debts totaling \$70,900.00.

The Committee filed a Form 99 (Miscellaneous Electronic Submission) on March 17, 2021, stating that an invoicing delay by a vendor caused the omission on the original report. Respondents further stated that the amendment was promptly filed once the error was discovered.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Independent Alaska and Susanna Orr, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.