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By Office of the Commission Secretary at 7:39 am, Aug 20, 2021

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463**SENSITIVE****MEMORANDUM**

August 20, 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 1018 - TAKEACTION MN FEDERAL FUND and  
Elianne Farhat, Treasurer (C00738815)

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$7,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1018 (RAD 21L-23). The ADR Office received this referral on April 30, 2021.

**SUMMARY:** The Reports Analysis Division (RAD) referred TAKEACTION MN FEDERAL FUND and Elianne Farhat, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$150,000 to support one (1) independent expenditure disclosed on the 2020 12-Day Pre-General Report. On January 29, 2021, the Committee filed a 48-Hour Report supporting this independent expenditure.

On January 29, 2021, the Committee filed a Form 99 (Miscellaneous Electronic Submission) acknowledging that it did not file the 48-Hour Report in a timely

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manner. Further, the Committee noted that it was carefully tracking expenditures requiring 24-Hour Reports, but it missed the requirement to file 48-Hour Reports.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of TAKEACTION MN FEDERAL FUND and Elianne Farhat, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.