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By Office of the Commission Secretary at 3:36 pm, Aug 17, 2021

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

August 17, 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 1020 - BLACK AMERICA'S POLITICAL ACTION  
COMMITTEE (C00300921) and Margaret Ekam, Treasurer

RESOLUTION TERMS: Certify that a representative of the Committee participated  
in an FEC training; and pay a civil penalty of \$2,725.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1020 (RAD 21L-24). The ADR Office received this referral on May 3, 2021.

**SUMMARY:** The Reports Analysis Division (RAD) is referring BLACK AMERICA'S POLITICAL ACTION COMMITTEE and Margaret Ekam, Treasurer (Respondents or the Committee) for failing to timely file two (2) 48-Hour Reports totaling \$54,494 to support four (4) independent expenditures disclosed on the 2020 12-Day Pre-General Report.

On February 4, 2021, the Committee filed one (1) 48-Hour Report to support four (4) independent expenditures, totaling \$54,494, disseminated October 5, 2020, October 6, 2020, and October 9, 2020. On March 2, 2021, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that its failure to timely file the 48-Hour Reports was due to a misinterpretation of the 48-Hour Report regulations and that they are now aware of the filing requirements.

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**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of BLACK AMERICA'S POLITICAL ACTION COMMITTEE and Margaret Ekam, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.