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By Office of the Commission Secretary at 10:53 am, Aug 20, 2021

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

August 20, 2021

TO: The Commission

THROUGH: Alec Palmer AP by *KAH*
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 1022 - CLUB FOR GROWTH ACTION and Adam
Rozansky, Treasurer (C00487470)

RESOLUTION TERMS: Develop and certify the implementation and distribution of
a policy document to be provided to compliance staff
detailing independent expenditure reporting procedures;
certify that a representative of the Committee participated in
an FEC training; and pay a civil penalty of \$14,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1022 (RAD 21L-26). The ADR Office received this referral on May 7, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred CLUB FOR GROWTH ACTION and Adam Rozansky, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$289,920.23 to support three (3) independent expenditures disclosed on the 12-Day Pre-General Report. On March 5, 2021, the Committee filed one (1) 48-Hour Report covering these independent expenditures, albeit untimely.

On March 5, 2021, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that it believed it had filed the 48-Hour Report in question.

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More specifically, the Committee stated that the report was successfully created and closed in FECFile, but not uploaded to the FEC. The Committee notes that the 48-Hour Report has since been successfully uploaded.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of CLUB FOR GROWTH ACTION and Adam Rozansky, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

¹ The ADRO confirmed with the Electronic Filing Office (EFO) that there were no issues with FEC servers at the time and no record of upload errors for the Committee.