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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

September 7, 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 1025 - Poder NC Action (C90020090)

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual, which includes procedures for disclosing independent expenditures; certify that a representative participated in an FEC training program; and pay a civil penalty of \$6,575.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1025 (RAD 21L-29). The ADR Office received this referral on May 19, 2021.

**SUMMARY:** The Reports Analysis Division (RAD) referred Poder NC Action (the Respondent) for failing to timely file two (2) 48-Hour Reports totaling \$132,671.24 to support eight (8) independent expenditures disclosed on the Amended 2020 October Quarterly Report, received December 30, 2020.

During negotiations, the Respondent stated that the failure to file the 48-Hour Reports was due to inexperience and a misunderstanding of the reporting requirements. The Respondent further stated that future filings will be submitted timely.

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**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Poder NC Action.
2. Approve the appropriate letters.
3. Close the file on this matter.