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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

October 8, 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

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1027 - Stronger Foundations, Inc. and Andrew Dipalma, Treasurer (C00760546)

RESOLUTION TERMS: Certify that a representative of the Committee participated in an FEC training; develop and certify implementation of a compliance operations manual; and pay a civil penalty of \$6,800.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1027 (RAD 21L-31). The ADR Office received this referral on May 21, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred Stronger Foundations, Inc. and Andrew Dipalma, Treasurer, (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report to support four (4) independent expenditures, totaling \$121,074, and one (1) 24-Hour Report to support one (1) independent expenditure, totaling \$10,500, disclosed on the 2020 July Quarterly Report. On March 3, 2021, the Committee filed the relevant independent expenditure reports.

The Committee states that it experienced technical difficulties filing its reports for an extended period of time and contends that it contacted the Commission for guidance on doing so in April and May 2020, prior to the events precipitating the enforcement action that is the subject of this agreement. The Committee asserts that due to the impact of the COVID-19 pandemic on Commission operations, it did not

further contact the Commission prior to the applicable filing deadlines. The Committee further states that once these technical issues were resolved and it was able to file reports electronically in October 2020, it believed these independent expenditure reports were no longer necessary because the information had been previously disclosed on quarterly reports and the primary election had already passed. The Committee states that this was an inadvertent administrative error and no attempt was made to avoid any public disclosure requirement.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Stronger Foundations, Inc. and Andrew Dipalma, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.