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By Office of the Commission Secretary at 4:11 pm, Sep 07, 2021

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 1028 - International Longshore and Warehouse Union  
-- Political Action Fund (C00176214)  
and Edwin R. Ferris, Treasurer

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual, which includes procedures for disclosing independent expenditures; and pay a civil penalty of \$2,400.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1028 (RAD 21L-34). The ADR Office received this referral on May 26, 2021.

**SUMMARY:** The Reports Analysis Division (RAD) referred International Longshore and Warehouse Union -- Political Action Fund and Edwin R. Ferris, Treasurer (Respondents or the Committee) for failing to timely file one (1) 24-Hour Report totaling \$31,989.48 to support one (1) independent expenditure disclosed on the 2020 30-Day Post-General Report. On February 10, 2021, the Committee filed one (1) 24-Hour Report coving these expenditures.

In a Form 99 (Miscellaneous Electronic Submission) filed on February 19, 2021, the Committee states that the failure to file the 24-Hour Report was inadvertent. The Committee also notes that in response to this issue, they have implemented

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new processes, which include improving their internal checklists and review processes, as well as improving training for staff.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of International Longshore and Warehouse Union -- Political Action Fund and Edwin R. Ferris, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.