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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 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 covering 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

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.