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By Office of the Commission Secretary at 10:56 am, Nov 08, 2021



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

November 8, 2021

TO: The Commission

THROUGH: Alec Palmer
Staff Director *AP*

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 1032 - Change Campaign Super PAC
and Adam Green, Treasurer (C00567396)

RESOLUTION TERMS: Retain an outside consultant or counsel to review its
compliance procedures and conduct a training with those
responsible for preparing and filing its reports; and pay a
civil penalty of \$7,850.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1032 (RAD 21L-39). The ADR Office received this referral on June 22, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred Change Campaign Super PAC and Adam Green, Treasurer (Respondents or the Committee) for failing to timely file one (1) 24-Hour Report totaling \$104,995.30 to support four (4) independent expenditures disclosed on the 2020 30-Day Post-General Report. On June 2, 2021, the Committee filed one (1) 24-Hour Report covering these independent expenditures.

On May 5, 2021, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that it directed its compliance vendor to file the 24-Hour Report in a timely manner. The Committee further stated that it received notification from

Recommendation to Approve
Negotiated Settlement
ADR 1032 (RAD 21L-39)
Page 1

its compliance vendor that the 24-Hour Report had been timely filed, the report was marked as filed in the Committee's compliance software, and the Committee was not made aware of the failure to file until it received notification from the Commission. During negotiations, the Committee stated that it had significant publicity about the ad expenditure related to the expenditures included in this report, including a press release that garnered media coverage about the advertising, which was covered a day before public disclosure to the FEC was legally required. Furthermore, the Committee filed a 24-Hour Report on October 30, 2020 regarding a separate independent expenditure. This was filed one day after the report addressed in this matter was due, and it included the spending at issue in this matter in its year-to-date totals.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Change Campaign Super PAC and Adam Green, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.