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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

October 20, 2021

TO: The Commission

THROUGH: Alec Palmer AP by *KAH*
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 1033 - Texas Organizing Project Political Action
Committee (C00756940) and Steven Halvorson, Treasurer

RESOLUTION TERMS: Retain an outside consultant to review compliance
procedures and conduct an on-site training with those
responsible for preparing and filing reports; and pay a civil
penalty of \$8,350.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1033 (RAD 21L-40). The ADR Office received this referral on June 23, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred Texas Organizing Project Political Action Committee and Steven Halvorson, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2020 30-Day Post-General Report, originally filed on December 3, 2020. On January 25, 2021, the Committee filed an Amended 2020 30-Day Post-General Report including \$353,611 in additional receipts.

The Committee filed a Form 99 (Miscellaneous Electronic Submission) on April 9, 2021, stating that on review of its communications, it discovered additional receipts that had not been previously reported. Upon completing the review, the Committee

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filed an amendment including the unreported receipts. Respondents further stated during negotiations that the failure to disclose all financial activity arose from a miscommunication between the Committee and its former compliance firm. The Committee stated that since the incident, the Committee hired a new Treasurer and compliance firm.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Texas Organizing Project Political Action and Steven Halvorson, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.