



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

September 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

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1036 - MI Planned Parenthood Votes (C00568931)
and John Thomas Keserich, Treasurer

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual, which includes procedures for disclosing independent expenditures; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$12,150.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1036 (RAD 21L-44). The ADR Office received this referral on July 14, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred MI Planned Parenthood Votes and John Thomas Keserich, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$245,306.71 to support five (5) independent expenditures disclosed on the Amended 2020 October Quarterly Report, received October 23, 2020. On October 16, 2020, the Committee filed one (1) 24-Hour¹ Report to disclose this activity.

¹ Please note that the Committee incorrectly filed a 24-Hour Report instead of the required 48-Hour Report of Independent Expenditures, made up to and including the 20th day before the 2020 General Election.

In a Form 99 (Miscellaneous Electronic Submission) filed on March 15, 2021 at 16:57, the Committee acknowledged that it failed to timely file the independent expenditure report in question and that the error was due to a misunderstanding of the reporting requirements. Further, the Committee noted that an additional staff member has since been added to the review and reporting process to ensure similar errors do not occur in the future.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of MI Planned Parenthood Votes and John Thomas Keserich, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.