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By Office of the Commission Secretary at 8:09 am, Nov 18, 2021

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463**SENSITIVE****MEMORANDUM**

November 18, 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 1042 - CASA IN ACTION PAC (C00685693)
and Melissa Guzman, Treasurer

RESOLUTION TERMS: Retain an outside consultant to review its compliance procedures and conduct an on-site training with those responsible for preparing and filing its reports; and pay a civil penalty of \$6,100.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1042 (RAD 21L-54). The ADR Office received this referral on August 9, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred CASA IN ACTION PAC and Melissa Guzman, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their original 2020 12-Day Pre-General Report, filed October 22, 2020. On May 17, 2021, the Committee filed an Amended 2020 12-Day Pre-General Report disclosing \$143,280.52 in additional receipts.

On June 18, 2021, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that the additional receipts were inadvertently excluded from the original report due to an increased volume of activity during the reporting period, coupled with the limited time between filing dates. Respondents also stated

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in a Form 99 filed on August 4, 2021, that they have taken several steps to improve the Committee's disclosure procedures, which included appointing an assistant treasurer to assist with recordkeeping and reporting functions. In addition, the Committee has contracted with a compliance consulting firm that includes an experienced team of consultants to coordinate with the Committee on the day-to-day processing of contributions and disbursements, perform bank reconciliations on a monthly basis, and prepare draft FEC reports which now undergo several levels of review.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of CASA IN ACTION PAC and Melissa Guzman, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.