

RECEIVED

By Office of the Commission Secretary at 10:55 am, Dec 21, 2021

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

December 21, 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 1045 - American Liberty Fund (C00623421)
and Paula Yvonne Edwards, Treasurer

RESOLUTION TERMS: Develop and certify the implementation and distribution of a policy document to be provided to all staff and compliance vendors detailing independent expenditure reporting procedures; and pay a civil penalty of \$1,800.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1045 (RAD 21L-58). The ADR Office received this referral on September 22, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred Respondents for failing to timely file one (1) 48-Hour Report totaling \$36,100.00 supporting one (1) independent expenditure disclosed on the 2020 October Quarterly Report. On August 3, 2021, the Committee filed a 48-Hour Report to disclose the independent expenditure.

Respondents state that the failure to file the 48-Hour Report was the result of a miscommunication regarding the expenditure type and further note the 48-Hour Report was filed upon notification of the failure to file from RAD. Respondents

further state all other 24-Hour and 48-Hour Reports filed by the Committee were complete and timely filed.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of American Liberty Fund and Paula Yvonne Edwards, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.