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By Office of the Commission Secretary at 8:02 am, Feb 10, 2022

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

February 10, 2022

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 1046 - Trust the People (C00768572)
and Kevin Harris, Treasurer

RESOLUTION TERMS: Develop and certify the implementation of a policy document that includes independent expenditure procedures; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$5,750 paid over 360 days.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1046 (RAD 21L-59). The ADR Office received this referral on September 23, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred Trust the People and Kevin Harris, Treasurer (Respondents or the Committee) for failing to timely file two (2) 48-Hour Reports totaling \$32,950 to support two (2) independent expenditures disclosed on the 2021 12-Day Pre-Special Report and two (2) 24-Hour Reports totaling \$55,000 to support two (2) independent expenditures disclosed on the 2021 12-Day Pre-Runoff Report. On July 21, 2021, the Committee filed the relevant independent expenditure reports.

During negotiations, Respondents stated that the failure to file the 24-Hour and 48-Hour Reports was inadvertent and that the activity was reported shortly after they were made aware of the error.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Trust the People and Kevin Harris, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.