

RECEIVED

By Office of the Commission Secretary at 7:44 am, Mar 11, 2022

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

March 11, 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

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1054 - COLORADO REPUBLICAN COMMITTEE
and Richard Elsner, Treasurer (C00033134)

RESOLUTION TERMS: Develop and implement a procedure requiring the review of wire transfers by multiple staff members for each required FEC report; and pay a civil penalty of \$9,800.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1054 (RAD 21L-61). The ADR Office received this referral on October 26, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred COLORADO REPUBLICAN COMMITTEE and Richard Elsner, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2020 Year End-Report filed on January 31, 2021. On April 29, 2021, the Committee filed an Amended Year-End Report which disclosed \$156,031.33 in additional receipts and \$202,524.68 in additional disbursements.

The Committee states that the additional activity consisted of wire transfers to and from affiliated political party committees and that the omission of that activity was inadvertent. The Committee further states that it discovered the errors after performing a detailed account review and bank reconciliations, that it voluntarily filed amendments to correct the errors, and that it provided additional training to members of the staff to help avoid such disclosure omissions in the future.

Recommendation to Approve
Negotiated Settlement
ADR 1054 (RAD 21L-61)
Page 1

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of COLORADO REPUBLICAN COMMITTEE and Richard Elsner, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.