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By Office of the Commission Secretary at 7:38 am, Feb 18, 2022

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

February 18, 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 1056 - End Citizens United and Kimberly Coleman,  
Treasurer (C00573261)

RESOLUTION TERMS: Retain counsel to review compliance procedures and  
conduct training with those responsible for preparing and  
filing reports; and pay a civil penalty of \$3,700.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1056 (RAD 21L-62). The ADR Office received this referral on October 28, 2021.

**SUMMARY:** The Reports Analysis Division (RAD) referred End Citizens United and Kimberly Coleman, Treasurer (Respondents or the Committee) for failing to timely file three (3) 48-Hour Reports totaling \$74,516.12 to support three (3) independent expenditures disclosed on the 2020 October Monthly Report.

The Committee states that the errors occurred due to software issues. In one case, the Committee timely entered the disbursement, generated, and filed the report, but, due to a software error, the report generated by the software did not include the disbursement for the independent expenditure in question. In the two other cases, the Committee timely prepared and filed an independent expenditure report, but made an error in identifying the date range for the report; therefore, the independent expenditures in question did not appear on the report that was filed. The Committee notes it has implemented additional procedures to retain and review draft reports prior to filing.

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**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of End Citizens United and Kimberly Coleman, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.