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By Office of the Commission Secretary at 8:09 am, Mar 25, 2022

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

March 25, 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 1061 - WFP IE Committee (C00626861)  
and Mike Boland, Treasurer

RESOLUTION TERMS: Amend relevant 2019-2020 reports to address any inadequate responses and non-responses to Requests for Additional Information from RAD; certify internal control procedures consistent with those described in the Commission's Internal Controls and Political Committees advisory document (2007) and the Best Practices for Committee Management; and pay a civil penalty of \$54,925.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1061 (AD A21-15). The ADR Office received this referral on November 4, 2021.

**SUMMARY:** The Reports Analysis Division (RAD) referred WFP IE COMMITTEE and Mike Boland, Treasurer (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2019-2020 election cycle. The Committee's errors included, among other items: failure to file reports and late filing; mathematical discrepancies; failure to provide supporting schedules; failure to properly itemize contributions and transfers from political committees;

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failure to properly itemize disbursements; and independent expenditure reporting problems.

In addition, Respondents failed to disclose all financial activity on the 2020 October Quarterly Report filed on October 15, 2020. On April 14, 2021, the Committee filed an Amended 2020 October Quarterly Report which disclosed \$1,193,048.61 in additional disbursements. Respondents were also referred for disclosing memo entries for independent expenditures totaling \$1,046,650.00 and \$185,600.00, on their 2020 30-Day Post-General and 2020 Year-End Reports, respectively, which were publicly disseminated prior to payment but were not disclosed as debts on Schedule D (Debts and Obligations).

Respondents contend that the Committee experienced reporting challenges during the 2019-2020 election cycle. The Committee additionally notes that it intends to terminate its political committee status upon resolution of this matter.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of WFP IE Committee and Mike Boland, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.