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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

June 22, 2022

TO: The Commission

THROUGH: Alec Palmer AP by *KAH*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1076 - WOMEN VOTE! and Denelle Robinson,
Treasurer (C00473918)

RESOLUTION TERMS: Conduct an annual training on independent expenditure reporting procedures and pay a civil penalty of \$14,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1076 (RAD 21L-22). The ADR Office received this referral from the Reports Analysis Division (RAD) on February 3, 2022.

SUMMARY: RAD referred WOMEN VOTE! and Denelle Robinson, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$170,146 to support one (1) independent expenditure disclosed in the 2020 October Monthly Report and for failing to timely file one (1) 24-Hour Report totaling \$57,220.38 to support two (2) independent expenditures disclose on the 2021 May Monthly Report. Both reports were filed, albeit untimely.

On February 25, 2021, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that a payment disclosed on the 2020 October Monthly Report was inadvertently omitted from the 48-Hour Report. Additionally, on July 28, 2021, the Committee filed a Form 99 stating that an invoice was inadvertently omitted from the 24-Hour Report. The Committee stated during negotiations that its inadvertent failure to file these reports occurred due to the high volume of transactions processed during this period. According to Respondents, the

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Committee also provided refresher training to staff on independent expenditure reporting procedures, and will continue to conduct this training on an annual basis.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of WOMEN VOTE! and Denelle Robinson, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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