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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

June 16, 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

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1078 - Connecticut Democratic State Central  
Committee and Roberto Alves, Treasurer (C00167320)

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual; certify that a representative of the Committee participated in an FEC training program or training conducted by party counsel; and pay a civil penalty of \$4,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1078 (AD A19-19). The ADR Office received this referral on March 1, 2022 from the Audit Division.

**SUMMARY:** The Audit Division referred Connecticut Democratic State Central Committee and Roberto Alves, Treasurer (Respondents or the Committee) for two (2) findings detailed in the Final Audit Report of the Commission, as approved on February 9, 2022. The findings state that the Committee did not maintain monthly payroll logs or equivalent records, totaling \$111,812, to document the percentage of time each employee spent in connection with a federal election for calendar years 2017 and 2018 and failed to disclose debts and obligations to vendors totaling \$33,273.

In response to the audit, the Committee filed a Form 99 (Miscellaneous Electronic Submission) on June 22, 2021, to disclose the debts and obligations and correct the public record. Regarding the Recordkeeping for Employees finding, the Committee stated it instituted procedures to ensure that time records are maintained for all employees paid in part with non-federal funds.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Connecticut Democratic State Central Committee and Roberto Alves, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.