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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

September 30, 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

Joshua A. Rebollozo *JAR*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1080 - Veterans for Responsible Leadership and  
Daniel Barkhuff, Treasurer (C00648808)

RESOLUTION TERMS: Develop and certify implementation of a compliance  
operations manual which includes internal controls; certify  
that a representative of the Committee participated in an  
FEC training; and pay a civil penalty of \$12,050.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1080 (RAD 22L-15). The ADR Office received this referral from the Reports Analysis Division (RAD) on June 14, 2022.

**SUMMARY:** RAD referred Veterans for Responsible Leadership and Daniel Barkhuff, Treasurer (Respondents or the Committee) for failing to timely file six (6) 24-Hour Reports totaling \$146,390.60 to support thirty (30) independent expenditures disclosed on the 2020 30-Day Post-General Report. On December 4, 2020, the Committee filed one (1) 24-Hour Report to support these independent expenditures, albeit untimely.

In a Form 99 (Miscellaneous Electronic Submission) filed on April 14, 2021, the Committee stated that the report was not timely filed because the staff preparing

the report were not made aware of the expenditures until after the 24-Hour reporting period had expired. The Committee stated it reported the independent expenditures immediately upon discovery of its failure to disclose the expenditures. During negotiations, the Committee stated it has reviewed its internal procedures and hired a compliance firm to assist with its filings.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Veterans for Responsible Leadership and Daniel Barkhuff, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.