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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

December 16, 2022

TO: The Commission

THROUGH: Alec Palmer
Staff Director *AP*

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 1085 - Association for Emergency Responders and
Firefighters, PAC and Robert Piaro, Treasurer (C00622472)

RESOLUTION TERMS: Develop and certify implementation of a compliance
operations manual; certify that the Treasurer of the
Committee participated in an FEC training; and pay a civil
penalty of \$10,900.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1085 (AD A19-21). The ADR Office received this referral from the Audit Division on August 16, 2022.

SUMMARY: The Audit Division referred Association for Emergency Responders and Firefighters, PAC and Robert Piaro, Treasurer (Respondents or the Committee) for one (1) finding detailed in the Final Audit Report of the Commission, as approved on July 28, 2022. The Commission approved a finding that the Committee understated its disbursements by \$769,804 on the original reports filed over the two-year period ending December 31, 2018.

In response to the audit, the Committee stated that it continues to refine its processes and procedures, including improving communication and document sharing with

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its accounting firm and adding a function to its filing software to detect discrepancies between software reports and bank statements. During negotiations, the Committee stated it has contracted with a new external compliance firm.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Association for Emergency Responders and Firefighters, PAC and Robert Piaro, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.