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By Office of the Commission Secretary at 7:56 am, Apr 14, 2023

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

April 14, 2023

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 1095 - GOA Victory Fund and
John Velleco, Treasurer (C00817122)

RESOLUTION TERMS: Develop and distribute a written policy to vendors involved with independent expenditures detailing procedures for good faith estimates and invoices; and pay a civil penalty of \$2,250.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1095 (RAD 22L-27). The ADR Office received this referral from the Reports Analysis Division (RAD) on December 13, 2022.

SUMMARY: The Reports Analysis Division (RAD) referred GOA Victory Fund and John Velleco, Treasurer (Respondents or the Committee) for failing to timely file one (1) 24-Hour Report, totaling \$30,000.00, to support one (1) independent expenditure disclosed on the 2022 July Monthly Report. On August 1, 2022, the Committee filed one (1) 24-Hour Report to support this independent expenditure.

During negotiations, Respondents stated that the Committee timely filed a 24-Hour Report on June 9, 2022, totaling \$20,000, and later amended that report for the full expenditure amount of \$50,000. The failure to timely disclose the total amount of

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the independent expenditure on a 24-Hour Report was the result of the vendor sending an additional invoice, dated June 26, 2022. The Committee contends that if it knew about the additional invoice, beforehand, it would have included it in the 24-Hour Report, filed on June 9, 2022, which reported the payment of four other invoices from the same vendor.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of GOA Victory Fund and John Velleco, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.