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**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

July 20, 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

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

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1099 - FF PAC and Chauncey McLean, Treasurer  
(C00669259)

RESOLUTION TERMS: Develop and certify the implementation and distribution of a policy document to all Committee personnel detailing reporting procedures and pay a civil penalty of \$10,300.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1099 (RAD 23L-05). The ADR Office received this referral from the Reports Analysis Division (RAD) on March 7, 2023.

**SUMMARY:** RAD referred FF PAC and Chauncey McLean, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2022 July Monthly Report, originally filed on July 20, 2022. On August 19, 2022, the Committee filed an Amended 2022 July Monthly Report including \$193,782.79 in additional in-kind contributions. RAD additionally referred FF PAC for failing to disclose all financial activity on its 2022 September Monthly Report, originally filed on September 20, 2022. On October 20, 2022, the Committee filed an Amended 2022 September Monthly Report including \$106,458.02 in additional in-kind contributions.

In Form 99s (Miscellaneous Electronic Submissions) filed on November 9, 2022, and December 29, 2022, the Committee stated its failure to timely disclose the in-kind contributions on its original reports was the result of a separate entity failing to timely disclose the value of its services to the Committee. The Committee further states it filed amended reports including the in-kind contributions on its own accord and as soon as the information became available.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of FF PAC and Chauncey McLean, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.