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**SENSITIVE**

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

September 8, 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 1108 - BlackPAC (C00609388)
and Adrienne R. Shropshire, Treasurer

RESOLUTION TERMS: Certify the implementation and distribution of a policy document to be provided to vendors detailing independent expenditure reporting procedures and pay a civil penalty of \$3,725.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1108 (RAD 23L-14). The ADR Office received this referral from the Reports Analysis Division (RAD) on May 2, 2023.

SUMMARY: RAD referred BlackPAC and Adrienne R. Shropshire, Treasurer (Respondents or the Committee) for failing to file one (1) 24-Hour Report to support three (3) independent expenditures disseminated on November 1, 2022, totaling \$13,303.20, and one (1) 48-Hour Report to support one (1) independent expenditure disseminated on November 1, 2022, totaling \$55,000, disclosed on the 2022 30-Day Post-General Report. The 24-Hour and 48-Hour Reports to support these expenditures were never filed.

During negotiations, the Committee stated that the failure to file independent expenditure reports was caused by a delay in receiving information from the vendor regarding the dissemination date. The Committee further stated that it takes its filing obligations very seriously and has put in place procedures with its vendors to reduce the chance of future miscommunications that affect independent expenditure disclosure.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of BlackPAC and Adrienne R. Shropshire, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.