

**RECEIVED**

By Office of the Commission Secretary at 10:32 am, Sep 13, 2023

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

September 13, 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 1109 - NATSO Inc. NATSO PAC  
and Lisa J. Mullings, Treasurer (C00097865)

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$1,350.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1109 (RAD 23L-17). The ADR Office received this referral from the Reports Analysis Division (RAD) on May 10, 2023.

**SUMMARY:** RAD referred NATSO Inc. NATSO PAC and Lisa J. Mullings, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2022 October Monthly Report filed on October 20, 2022. On October 28, 2022, the Committee filed an Amended 2022 October Monthly Report which disclosed \$58,000 in additional disbursements.

During negotiations, Respondents stated that the error occurred after changing the staff responsible for preparing reports and that, due to a misunderstanding, the original report failed to include all disbursements from the reporting period. The

Committee further states it has since retained the services of a compliance firm to assist with their filings.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of NATSO Inc. NATSO PAC and Lisa J. Mullings, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.