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By Office of the Commission Secretary at 1:51 pm, Oct 04, 2023

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

September 29, 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 1111 - Sheila Cherfilus McCormick for Congress, Inc.  
and Dr. Olubisi Aina, Treasurer (C00677492)

RESOLUTION TERMS: Amend relevant 2021-2022 reports to address any outstanding Requests For Additional Information (RAI) from RAD; certify annually, for two consecutive years, that the Committee continued to retain the services of a compliance team; certify that a representative of the Committee participated in an FEC training program; and pay a civil penalty of \$5,350.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1111 (AD A23-08). The ADR Office received this referral on May 10, 2023.

**SUMMARY:** The Reports Analysis Division (RAD) referred Sheila Cherfilus McCormick for Congress, Inc. and Dr. Olubisi Aina, Treasurer (the Committee or Respondents) for a series of reporting errors and other FECA violations during the 2021-2022 election cycle. The Committee's errors included, among other items: excessive, prohibited, and other impermissible contributions/transfers; mathematical discrepancies; failure to provide supporting schedules; failure to properly itemize disbursements; and problems with reporting financial

Recommendation to Approve  
Negotiated Settlement  
ADR 1111 (AD A23-08)  
Page 1

activity/FEC Database. In addition, RAD referred Respondents for failing to disclose adequate purposes for disbursements totaling \$116,553.95 on their 2021 12-Day Pre-Special Report.

During negotiations, Respondents contended that the Committee experienced reporting challenges during the 2021-2022 election cycle. Further, the Committee has hired an external compliance firm to assist with correcting reports from the 2021-2022 election cycle and organizing the Committee's data to assist with future compliance.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Sheila Cherfilus McCormick for Congress, Inc and Dr. Olubisi Aina, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.