



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

October 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 1117 - GALEO Impact Fund PAC and Clara Elena
Puerta Navarro, Treasurer (C00763433)

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual which includes procedures for disclosing independent expenditures and internal controls; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$4,850.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1117 (RAD 23L-24). The ADR Office received this referral from the Reports Analysis Division (RAD) on May 30, 2023.

SUMMARY: RAD referred GALEO Impact Fund PAC and Clara Elena Puerta Navarro, Treasurer (Respondents or the Committee) for failing to timely file two (2) 24-Hour Reports to support two (2) independent expenditures disseminated on December 20, 2020, and December 30, 2020, totaling \$64,657.30, disclosed on the Amended 2021 30-Day Post-Runoff Report. On March 21, 2023, the Committee filed one (1) 24-Hour Report to support the expenditures, albeit untimely.

During negotiations, the Committee acknowledged the error and attributed its mistakes to the unfamiliarity of its staff with independent expenditure reporting requirements. Upon receiving notification from the Commission, the Committee filed the required 24-Hour Report, albeit untimely, and states that it is now aware of independent expenditure reporting requirements.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of GALEO Impact Fund PAC and Clara Elena Puerta Navarro, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.