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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

December 4, 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 1128 - International Brotherhood of Electrical
Workers Political Action Committee and
Paul Noble, Treasurer (C00027342)

RESOLUTION TERMS: Certify that a representative of the Committee participated
in an FEC training and pay a civil penalty of \$3,900.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1128 (RAD 23L-39). The ADR Office received this referral from the Reports Analysis Division (RAD) on August 17, 2023.

SUMMARY: RAD referred International Brotherhood of Electrical Workers Political Action Committee and Paul Noble, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2022 Year-End Report filed on January 9, 2023. On February 15, 2023, the Committee filed an Amended 2022 Year-End Report which disclosed \$214,344.76 in additional receipts.

In a Form 99 (Miscellaneous Electronic Submission) filed on July 19, 2023, the Committee stated that it was short-staffed during the filing of the original 2022 Year-End Report and that upon reconciling their FEC report with their bank statements, they discovered the additional receipts and filed the Amended 2022

Year-End Report on February 15, 2023. During negotiations, Respondents maintained that their willingness to agree to the settlement was purely aimed at resolving the raised issues, and not to be interpreted as an admission of fault.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of International Brotherhood of Electrical Workers Political Action Committee and Paul Noble, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.