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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

January 24, 2024

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 1136 - Republican Party of Minnesota - Federal and  
Kathy Latham, Treasurer (C00001313)

RESOLUTION TERMS: Develop and certify implementation of a process to track receipt of, and response to, communications with the Commission; certify the Committee amended relevant 2021-2022 reports after consultation with the FEC's Reports Analysis Division (RAD); certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$6,625.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1136 (RAD 23L-48). The ADR Office received this referral on September 19, 2023.

**SUMMARY:** RAD referred Republican Party of Minnesota - Federal and Kathy Latham, Treasurer (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2021-2022 election cycle. The Committee's errors included, among other items: mathematical discrepancies, failure to properly itemize contributions from individuals, federal election activity/levin funds, and allocated federal and non-federal activity.

During negotiations, the Committee acknowledged the errors and stated it has assembled an internal team to review its compliance procedures and will implement changes to its policies and procedures as recommended by the team.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Republican Party of Minnesota - Federal and Kathy Latham, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.