

**RECEIVED**

By Office of the Commission Secretary at 10:39 am, Feb 02, 2024

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

February 2, 2024

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP*

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 1139 - United Rural Democrats of America and  
Amelia Johnson, Treasurer (C00759548)

RESOLUTION TERMS: Certify the Committee amended relevant 2021-2022 reports after consultation with the FEC's Reports Analysis Division (RAD); develop and certify implementation of a compliance operations manual which includes internal controls; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty in the amount of \$5,200 in 90 days.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1139 (RAD 23L-51). The ADR Office received this referral on September 19, 2023.

**SUMMARY:** RAD referred United Rural Democrats of America and Amelia Johnson, 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: mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize contributions from individuals, failure to properly itemize contributions and transfers from political committees, failure to properly itemize contributions and transfers to political committees, and failure to

Recommendation to Approve  
Negotiated Settlement  
ADR 1139 (RAD 23L-51)  
Page 1

properly itemize disbursements, and two (2) Non-filer Notices (RQ-7s) for failure to file reports and late filing.

During negotiations, Respondents stated that there were challenges during the 2021-2022 election cycle that affected the Committee's reporting. The Committee additionally stated that it has taken steps to improve its internal communication processes to ensure timely and accurate reporting in the future.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of United Rural Democrats of America and Amelia Johnson, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.