



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

MEMORANDUM

November 27, 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

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1174 - Coalition for Fantasy Sports PAC and
Kayla Lott, Treasurer (C00845131)

RESOLUTION TERMS: Certify that a representative of the Committee participated
in an FEC training program and pay a civil penalty of
\$4,975.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1174 (RAD 24L-24). The ADR Office received this referral from the Reports Analysis Division (RAD) on July 16, 2024.

SUMMARY: RAD referred Coalition for Fantasy Sports PAC and Kayla Lott, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2023 Year-End Report filed on January 25, 2024. On March 21, 2024, the Committee filed an Amended 2023 Year-End Report which disclosed \$112,500 in additional receipts and \$26,400 in additional disbursements that were not disclosed on the original report.

On April 25, 2024, the Committee filed a Form 99 (Miscellaneous Electronic Submission), stating it failed to timely report all financial activity on its original report due to two main issues. First, its compliance officers did not initially have

access to view the Committee's bank accounts. Second, the Committee did not have internal controls for monetary inflows or non-federal disbursements in place when the error occurred. Respondents stated they have since devised and implemented procedures to monitor and review monetary inflows. Further, the Committee has retained a compliance firm and granted them authorized permission to view the Committee's bank accounts to ensure timely and accurate future reporting.



RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Coalition for Fantasy Sports PAC and Kayla Lott, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.