



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**SENSITIVE**

**MEMORANDUM**

December 27, 2024

TO: The Commission

THROUGH: Alec Palmer <sup>AP by DCB</sup>  
Staff Director

FROM: Patricia C. Orrock <sup>PCO</sup>  
Chief Compliance Officer

Krista J. Roche <sup>KJR</sup>  
Director, ADR Office

Joshua A. Rebollozo <sup>JAR</sup>  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1178 - D'Esposito for New York and Claudia  
Armendinger, Treasurer (C00809426)

RESOLUTION TERMS: Develop and certify the implementation and distribution of  
a policy document detailing FEC reporting and debt tracking  
procedures; certify that a representative of the Committee  
participated in an FEC training; and pay a civil penalty of  
\$6,075.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1178 (RR 24L-02). The ADR Office received this referral from the Office of General Counsel on August 9, 2024, in accordance with a vote from the Commission.

**SUMMARY:** The Reports Analysis Division (RAD) referred D'Esposito for New York and Claudia Armendinger, Treasurer, (Respondents or the Committee) for failing to disclose all financial activity on its original 2022 30-Day Post-General Report, filed on December 8, 2022. On July 20, 2023, the Committee filed an Amended 2022 30-Day Post-General Report which disclosed additional incurred debts totaling \$150,279.30.

During negotiations, the Committee stated that at the time of the original filing its compliance vendor was unaware of the newly incurred debts due to a miscommunication with an external consultant. The Committee later discovered the error and filed the amended report to properly disclose the additional debts. The Committee further stated it has implemented an internal review process to ensure all future financial activity, including debt, is timely and accurately reported.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of D'Esposito for New York and Claudia Armendinger, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.