



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463



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WASHINGTON, D.C.

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SENSITIVE

MEMORANDUM

November 14, 2017

TO: The Commission

THROUGH: Alec Palmer *swt/fn*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista J. Roche *KJR*
Acting Director, ADR Office

SUBJECT: ADR 831 21st Century Democrats and Bill Combs,
Treasurer, Recommendation to Approve Negotiated
Settlement

RESOLUTION TERMS: Develop and certify implementation of a compliance
operations manual; and pay a civil penalty of \$5,850

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 831 (RAD 17L-18). The ADR Office received this referral on June 26, 2017.

SUMMARY: The Reports Analysis Division referred Respondents for failing to disclose all financial activity on its 2016 30-Day Post-General Report, originally filed on December 8, 2016. On February 15, 2017, the Committee filed an Amended 2016 30-Day Post-General Report including \$118,367.13 in additional receipts.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on April 27, 2017, indicating that the Committee "reviewed its disclosure process and has completed an exhaustive internal audit of all data processed during FY2016." The Committee contends that the error was due to a vendor who did not properly upload itemized donor data and that the Committee amended reports once the data was uploaded. In addition, the Committee indicates that it "has taken major steps to adequately correct its disclosure process to be in compliance with the Commission's guidelines."

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RECOMMENDATIONS:

1. Approve the attached negotiated settlement of 21st Century Democrats and Bill Combs, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.