



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463



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**SENSITIVE**

**MEMORANDUM**

November 28, 2017

**TO:** The Commission

**THROUGH:** Alec Palmer *AP*  
Staff Director

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

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

**SUBJECT:** ADR 836 Arizona Grassroots Action PAC and Lisa Lisker,  
Treasurer, Recommendation to Approve Negotiated  
Settlement

**RESOLUTION TERMS:** Develop and certify implementation of a compliance  
operations manual; and pay a civil penalty of \$2,250

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 836 (RAD 17L-25). The ADR Office received this referral on August 4, 2017.

**SUMMARY:** The Reports Analysis Division (RAD) referred Arizona Grassroots Action PAC and Lisa Lisker, Treasurer (Respondents or the Committee) for failing to file one 24-Hour Report totaling \$30,000 to support one independent expenditure disclosed on the 2016 30 Day Post-General Report.

In a Miscellaneous Electronic Submission (FEC Form 99) filed on May 10, 2017, the Committee indicated that the failure to file this independent expenditure report was due to administrative oversight. The Committee notes it did timely file approximately seventy independent expenditure reports and indicates it will implement additional procedures to ensure accurate reporting in the future.

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**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Arizona Grassroots Action PAC and Lisa Lisker, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.