



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2018 APR -5 AM 11:11

SENSITIVE

MEMORANDUM

April 5, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 853 Hispanic Victory PAC and Gustavo Decker,
Treasurer, Recommendation to Approve Negotiated
Settlement

RESOLUTION TERM: Pay a civil penalty of \$7,600.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 853 (AD A17-12). The ADR Office received this referral on November 8, 2017.

SUMMARY: The Reports Analysis Division referred and the Audit Division transferred Respondents for a series of reporting errors and other FECA violations during the 2015-2016 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's reporting errors included, among other items: failure to file reports and late filing, failure to provide supporting schedules, failure to properly itemize contributions from individuals, and independent expenditure reporting problems.

Respondents contend that there were reporting challenges during the 2016 election cycle. Specifically, Respondents indicate that since these reporting errors occurred, a new compliance firm with experience filing FEC reports has been retained. In addition, the Committee began utilizing new compliance software to track its activity. All relevant amendments related to this matter have been filed.

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RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Hispanic Victory PAC and Gustavo Decker, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.