



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

July 11, 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 867 Working for Us Political Action Committee Inc.
and Steven Rosenthal, Treasurer, Recommendation to
Approve Negotiated Settlement

RESOLUTION TERMS: Certify implementation of a procedure by which all
independent expenditure reporting is reviewed by an
additional staff member prior to filing; and pay a civil
penalty of \$6,600.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 867 (RR 18L-05). The ADR Office received this referral from the Office of General Counsel on April 6, 2018.

SUMMARY: The Reports Analysis Division (RAD) referred Working for Us Political Action Committee Inc. and Steven Rosenthal, Treasurer (Respondents or the Committee) for failing to file one (1) 24-Hour Report totaling \$88,508.48 to support four (4) independent expenditures disclosed on the 2016 July Quarterly Report.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on August 22, 2017, indicating that the 24-Hour Report was produced to be filed on April 22, 2016, however, due to a clerical error the wrong report was filed on that day. The report filed was a duplicate of a report filed on April 16, 2016. On August 22, 2017, sixteen months after the expenditures occurred, the Committee filed the missing 24-Hour Report.

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RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Working for Us Political Action Committee Inc. and Steven Rosenthal, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.