



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION  
STANDARD

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**SENSITIVE**

August 22, 2018

**MEMORANDUM**

**TO:** The Commission

**THROUGH:** Alec Palmer *EWLP for*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

**SUBJECT:** ADR 868 National Nurses United for Patient Protection and Martha Kuhl, Treasurer, Recommendation to Approve Negotiated Settlement

**RESOLUTION TERMS:** Complete training in consultation with the FEC's Information Division regarding independent expenditure reporting requirements; and pay a civil penalty of \$3,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 868 (RR 18L-08). The ADR Office received this referral from the Office of General Counsel on April 6, 2018.

**SUMMARY:** The Reports Analysis Division referred National Nurses United for Patient Protection and Martha Kuhl, Treasurer (Respondents or the Committee) for failing to file four (4) 48-Hour Reports totaling \$28,049.00 to support five (5) independent expenditures and failing to file six (6) 24-Hour Reports totaling \$49,860.41 to support eight (8) independent expenditures disclosed on the 2016 July Quarterly Report.

The Committee filed two Miscellaneous Electronic Submissions (Form 99) on September 29, 2017, indicating that all independent expenditures that were unreported or untimely reported were done so inadvertently and without any intention to violate its reporting obligations. The Committee contends that the vast majority of its independent expenditures for 2016 were timely and accurately reported.

Recommendation to Approve  
Settlement Agreement  
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**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of National Nurses United for Patient Protection and Martha Kuhl, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.