



FEDERAL ELECTION COMMISSION 2019 AUG - 1 PM 3:21
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

August 1, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by MHAH*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 906 Americans for the Cure of Breast Cancer and Robert Piaro, Treasurer, Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Certify the implementation of a compliance operations manual; certify that a representative of the Committee participated in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division regarding bank reconciliation best practices; and pay a civil penalty of \$9,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 906 (RAD 19L-05). The ADR Office received this referral on March 18, 2019.

SUMMARY: The Reports Analysis Division (RAD) referred Americans for the Cure of Breast Cancer and Robert Piaro, Treasurer (Respondents or the Committee) for amending its 2018 July Quarterly Report on September 27, 2018 and December 18, 2018 to disclose a total of \$631,486.90 in additional disbursements.

During negotiations, Respondents stated that at the time of the submission of the inaccurate information, the Committee was transitioning to a new filing software and implementing procedures to ensure accurate filing. Since that time, the Committee has utilized new filing software and implemented reconciliation procedures to include an itemized review of financial information and transaction

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data for FEC reports. In addition, the Committee will implement a compliance operations manual to facilitate and support accurate reporting and filing.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Americans for the Cure of Breast Cancer and Robert Piaro, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.