



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

July 25, 2019

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TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: ADR 909 Win Justice and Deepak Pateriya, Treasurer;
Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Develop and certify implementation of a compliance
operations manual, which includes procedures for
determining and disclosing independent expenditures; and
pay a civil penalty of \$2,450.00.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 909 (RAD 19L-06). The ADR Office received this referral on March 26, 2019.

SUMMARY: The Reports Analysis Division referred Win Justice and Deepak Pateriya, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$48,682.53 supporting one (1) independent expenditure disclosed on the Committee's 2018 October Quarterly Report.

On January 10, 2019 the Committee filed a Form 99 (Miscellaneous Electronic Submission) recognizing that they had failed to timely file the 48-Hour Report and that it was an inadvertent result of "an internal communication issue, and the committee has taken steps to prevent such errors in the future." During negotiations, Respondents stated that once the omission was brought to their attention, the 48-

Hour Report was immediately filed and an internal training on independent expenditures was conducted.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Win Justice and Deepak Pateriya, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.