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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2019 OCT 24 AM 9:35

**SENSITIVE**

**MEMORANDUM**

October 23, 2019

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

Joshua A. Rebollozo *JAR*  
ADR Specialist, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 918 — Engineers Political Education Committee  
(EPEC)/International Union of Operating Engineers and  
Brian E. Hickey, Treasurer, (C00029504)

RESOLUTION TERMS: Revise the Committee's compliance operations manual and certify its revision and implementation; 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; and pay a civil penalty of \$8,175.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 918 (RAD 19L-13). The ADR Office received this referral on June 24, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred Engineers Political Education Committee (EPEC)/International Union of Operating Engineers and Brian E. Hickey, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on the 2018 12 Day Pre-General Report, originally filed on October 25, 2018. On December 3, 2018, the Committee filed an Amended 2018 12 Day Pre-General Report including \$53,153.76 in additional receipts and \$250,000.00 in additional disbursements.

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The Committee stated that the failure to disclose all receipts and disbursements on the original report was due to inadvertent administrative errors. The Committee further stated that it has implemented measures in coordination with its connected organization to improve internal controls, including performing regular bank reconciliations prior to filing reports with the Commission.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Engineers Political Education Committee (EPEC)/International Union of Operating Engineers and Brian E. Hickey, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.