



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

November 26, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by MAH*  
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: Recommendation to Approve Negotiated Settlement  
ADR 922— United We Can (C00523621) and  
Gerald Hudson, Treasurer

RESOLUTION TERMS: Develop and certify implementation of compliance operations manual; conduct an internal training that includes procedures for determining and disclosing independent expenditures; and pay a civil penalty of \$12,100.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 922 (RAD 19L-17). The ADR Office received this referral on July 16, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred United We Can and Gerald Hudson, Treasurer (Respondents or the Committee) for failing to file one (1) 24-Hour Report totaling \$161,347.77 to support two (2) independent expenditures disclosed on the 2018 30-Day Post-General Report.

Respondents state that a miscommunication regarding the dissemination date for the independent expenditures resulted in the Committee inadvertently omitting these expenditures from a filed 24-Hour Report. Respondents state that since the error they have automated their internal independent expenditure process, with any updates or changes being documented within an electronic tracking system.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of United We Can and Gerald Hudson, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.