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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

<u>**MEMORANDUM**</u>

October 31, 2019

TO: The Commission

THROUGH: Alec Palmer
                       Staff Director

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

                       Krista J. Roche
                       Director, ADR Office

                       Joshua A. Rebollozo
                       ADR Specialist, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
                       ADR 924 — Working Michigan (SuperPac) and Zinnia
                       Kallabat, Treasurer, (C00627240)

RESOLUTION TERMS: Develop and certify 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; and pay a civil penalty of $4,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 924 (RAD 19L-21). The ADR Office received this referral on August 1, 2019.

> **SUMMARY:** The Reports Analysis Division referred Working Michigan (SuperPac) and Zinnia Kallabat, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on the 2018 October Quarterly Report, originally filed on October 14, 2018. On December 5, 2018, the Committee filed an Amended 2018 October Quarterly Report including $59,193.41 in additional receipts and $55,207.39 in additional disbursements.
>
> The Committee stated that the failure to disclose all activity was inadvertent and was the result of a lack of communication. In addition, the Committee stated that

as result of this incident they are in the process of implementing procedures with their vendors and field workers to receive information on a daily basis to ensure more accurate and timely filed reports.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Working Michigan (SuperPac) and Zinnia Kallabat, Treasurer.

2. Approve the appropriate letters.

3. Close the file on this matter.