



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2019 DEC 23 PM 12:01

**SENSITIVE**

**MEMORANDUM**

December 23, 2019

TO: The Commission

THROUGH: Alec Palmer *PCO* for 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: Recommendation to Approve Negotiated Settlement  
ADR 931 — Patients for Affordable Drugs Action and  
Benjamin L. Wakana, Treasurer (C00680926)

RESOLUTION TERMS: Certify that a representative participated in an FEC training  
program and pay a civil penalty of \$6,950.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 931 (RAD 19L-29). The ADR Office received this referral on September 6, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred Patients for Affordable Drugs Action and Benjamin L. Wakana, Treasurer (Respondents or the Committee) for failing to timely file three (3) 48-Hour Reports totaling \$138,860.97 to support five (5) independent expenditures disclosed on the 2018 October Quarterly Report.

Respondents state they were new to independent expenditure reporting and inadvertently failed to timely file the 48-Hour Reports. Respondents have since adopted new procedures to prevent similar errors from happening in the future. The Committee now utilizes compliance software and an electronic system for tracking independent expenditures. In addition, Respondents state that if the costs associated with independent expenditures

are not known at the time of dissemination, they will estimate the costs on 24 and 48-Hour Reports to prevent late filing.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Patients for Affordable Drugs Action and Benjamin L. Wakana, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.