



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SECRETARIAT

2020 JAN 16 PM 11:01

SENSITIVE

MEMORANDUM

January 16, 2020

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 932 — For Our Future and Gail Stoltz, Treasurer,
(C00620971)

RESOLUTION TERMS: 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 \$2,475.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 932 (RAD 19L-30). The ADR Office received this referral on September 6, 2019.

SUMMARY: The Reports Analysis Division (RAD) referred For Our Future and Gail Stoltz, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2018 30 Day Post-General Report, originally filed on December 6, 2018. On December 21, 2018, the Committee filed an Amended 30 Day Post-General Report including \$133,489.00 in additional in-kind contributions.

The Committee stated that an internal miscommunication resulted in the inadvertent omission of the in-kind contributions in the form of staff salaries and benefits, and that the Committee's internal compliance efforts identified and

rectified the omission within 15 days. The Committee further stated that it has since reviewed and implemented additional procedures to prevent similar omissions, including enhancing internal reconciliation procedures, scheduling more staff trainings, and adjusting compliance assignments and responsibilities.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of For Our Future and Gail Stoltz, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.