



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

February 13, 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

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 939 - Association For Firefighters PAC
DBA Association for Firefighters (C00639708) and
Michael Kahn, Treasurer

RESOLUTION TERMS: Certify that a representative participates in an FEC training program; develop and certify implementation of a process to track receipt of, and response to, communications with the Commission; and pay a civil penalty of \$3,850.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 939 (AD A19-20). The ADR Office received this referral on September 30, 2019.

SUMMARY: The Reports Analysis Division referred and the Audit Division transferred the Association For Firefighters PAC DBA Association for Firefighters and Michael Kahn, Treasurer (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2017-2018 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's reporting

errors included, among other items: failure to file reports and late filing, mathematical discrepancies, and failure to provide supporting schedules.

Respondents contend that there were reporting challenges during the 2017-2018 election cycle. The Committee filed amended reports to correct the public record for the 2017-2018 election cycle reporting errors. RAD reviewed these amendments and determined that no further corrective action is required.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Association For Firefighters PAC DBA Association for Firefighters and Michael Kahn, Treasurer,
2. Approve the appropriate letters.
3. Close the file on this matter.