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By Office of the Commission Secretary at 9:39 am, Mar 10, 2020

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

March 10, 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 943 - Democratic Advancement PAC (C00381517)  
and Thomas A. Cramer, Treasurer

RESOLUTION TERMS: Amend relevant 2017-2018 reports to address any inadequate responses and nonresponses to requests for additional information from RAD; 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 \$8,815.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 943 (AR 19-06R). The ADR Office received this referral from the Office of General Counsel on October 21, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred and the Audit Division transferred the Democratic Advancement PAC and Thomas A. Cramer, Treasurer, (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2017-2018 election cycle. The Committee's errors included, among other items: the failure to file reports and late filing, and issues with allocated federal and non-federal activity.

Respondents contend that there were personnel and software challenges during the 2017-2018 election cycle that may have affected the Committee's reporting. Under the terms of the proposed agreement, the Committee will amend relevant 2017-2018 reports to address any inadequate responses and nonresponses to requests for additional information from RAD. In addition, Respondents indicate that they will develop and certify the implementation of a process to track receipt of, and response to, communications with the Commission as well as attend an FEC training program in accordance with the terms of this agreement in order to enhance their compliance efforts.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Democratic Advancement PAC and Thomas A. Cramer, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.