



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

March 9, 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 944 - One Nation United (C00624718) and
Desiree Crevecoeur-Machail, Treasurer

RESOLUTION TERMS: Certify that a representative of the Committee participated
in an FEC training program; develop and certify
implementation of a compliance operations manual; perform
an annual internal audit and reconciliation for two years; and
pay a civil penalty of \$21,675.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 944 (AR 19-07R). 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 One Nation United and Desiree Crevecoeur-Macphail, 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: failure to file reports, failure to timely file reports, failure to provide supporting schedules, and independent expenditure reporting problems.

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In addition, RAD referred Respondents for failing to disclose newly incurred debts on the 2017 Year-End Report, originally filed on February 1, 2018¹. On March 20, 2019, the Committee filed an Amended 2017 Year-End Report including \$134,573 in debts not previously disclosed on the original report. Respondents were also referred for failing to file ten (10) 48-Hour Reports totaling \$351,773 to support eleven (11) independent expenditures on the following reports: 2017 October Quarterly Report; 2017 Year-End Report; 2018 October Quarterly Report; and 2018 12 Day Pre-General Report.

Respondents contend that there were reporting challenges during the 2017-2018 election cycle. Respondents indicate that since these reporting errors occurred, a new compliance firm with experience filing FEC reports has been retained. In addition, the Committee began utilizing new compliance software to track its activity.

¹ The 2017 Year-End Report was due on 1/31/2018.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of One Nation United and Desiree Crevecoeur-Macphail, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.