



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.

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.