



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

March 9, 2020

TO: The Commission

THROUGH: Alec Palmer *AP by SHALT*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 945 — WFP IE Committee and Mike Boland,  
Treasurer (C00626861)

RESOLUTION TERMS: Complete compliance with the outstanding terms of the Negotiated Settlement in ADR 820, including training and a compliance manual; perform an annual internal audit and reconciliation for two years; develop and certify the implementation of a process to track receipt of, and response to, communications with the Commission; and pay a civil penalty of \$12,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 945 (AR 19-08R). 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 WFP IE Committee<sup>1</sup> and Mike Boland, 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: mathematical discrepancies, the failure to provide supporting schedules, the failure to properly itemize contributions from individuals, the failure

<sup>1</sup> On February 27, 2020, the Committee filed an amended Form 1 changing its name to WFP IE Committee. At the time of the referral, the Committee was known as the Working Families Party Independent Expenditure Committee.

to properly itemize contributions and transfers from political committees, the failure to properly itemize disbursements, and independent expenditure reporting problems.

In addition, reports filed contained referable issues including cash-on-hand discrepancies totaling \$677,426.03, the failure to disclose receipts on the 2018 October Quarterly Report totaling \$163,913.80, the failure to properly report independent expenditures disseminated prior to payment totaling \$120,000, and the failure to file 48-Hour Reports for independent expenditures totaling \$50,000.

Respondents contend that the Committee experienced reporting challenges during the 2017-2018 election cycle. 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 perform an internal audit and reconciliation for two years in accordance with the terms of this agreement in order to enhance their compliance efforts.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of WFP IE Committee and Mike Boland, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.