



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

March 3, 2020

TO: The Commission

THROUGH: Alec Palmer *AP by MAH*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

Joshua A. Rebollozo *JAR*  
ADR Specialist, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 947 — Build the Wave and Nathan Lerner, Treasurer  
(C00667667)

RESOLUTION TERMS: Certify that the Committee's internal compliance staff and treasurer participated in an FEC conference, webinar, or other training program developed in consultation with the FEC's Information Division; develop and certify implementation of a compliance operations manual; and pay a civil penalty to the Commission in the amount of \$4,125.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 947 (RAD 19L-38). The ADR Office received this referral on October 25, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred Build the Wave and Nathan Lerner, Treasurer (Respondents or the Committee) for failing to timely file one (1) 24-Hour Report totaling \$55,041.00 to support fifty-four (54) independent expenditures disclosed on the Amended 2018 30 Day Post-General Report.

The Committee stated that the failure to timely file the 24-Hour Report was a result of a disruption in Committee staffing combined with a high volume of activity during the final days of the election.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Build the Wave and Nathan Lerner, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.