



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2020 MAR 10 PM 3:27

SENSITIVE

MEMORANDUM

March 10, 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 948 - Human Rights Campaign Equality Votes and James M. Rinefierd, Treasurer (C00508440)

RESOLUTION TERMS: Certify that a representative of the Committee participated in an FEC training program; develop and certify the implementation of a compliance operations manual; and pay a civil penalty of \$2,350.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 948 (RAD 19L-39). The ADR Office received this referral on October 25, 2019.

SUMMARY: The Reports Analysis Division (RAD) referred Human Rights Campaign Equality Votes and James M. Rinefierd, Treasurer (Respondents or the Committee) for failing to timely file two (2) 24-Hour Reports totaling \$31,350.00 to support six (6) independent expenditures disclosed on the Amended 2018 30 Day Post-General Report received January 16, 2019.

The Committee stated that the failure to file the 24-Hour Reports was due to an administrative error. The Committee further stated that it has since implemented additional internal procedures to ensure the timely filing of future 24-Hour Reports, including hiring additional compliance staff. The Committee contends that these

procedures were implemented prior to receiving notice from the Commission regarding the referral of this matter to the ADR Office.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Human Rights Campaign Equality Votes and James M. Rinefierd, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.