



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2020 MAR 10 PM 3:27

**SENSITIVE**

**MEMORANDUM**

March 10, 2020

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP by MATH*

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

Recommendation to Approve  
Negotiated Settlement  
ADR 948 (RAD 19L-39)  
Page 1

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. Rinefield, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.