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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

March 23, 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 952 - CASA in Action PAC (C00685693) and
Melissa Guzman, Treasurer

RESOLUTION TERMS: Certify that a representative participates in an FEC training program; develop and certify the implementation of a compliance operation manual; formalize a process for monthly reconciliation of bank accounts; and pay a civil penalty of \$13,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 952 (RAD 19L-42). The ADR Office received this referral on November 26, 2019.

SUMMARY: The Reports Analysis Division (RAD) referred CASA in Action PAC and Melissa Guzman, Treasurer, (Respondents or the Committee) for failing to timely file ten (10) 24-Hour Reports totaling \$112,702.93 to support two hundred and thirty-two (232) independent expenditures disclosed on the 2018 30-Day Post-General Report. RAD also referred the Committee for amending its 2018 30-Day Post-General Report to disclose additional receipts of \$190,500.

Respondents state that they have adopted new procedures to prevent a similar error from happening in the future. The Committee now utilizes an electronic system for tracking independent expenditures to prevent the late filing of 24-Hour Reports. Regarding the additional receipts on the amended 2018 30-Day Post-General Report, Respondents state that the failure to report these transactions was caused by an inadvertent data entry error, and an amended report was filed upon discovering the error.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of CASA in Action PAC and Melissa Guzman, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.