

**RECEIVED***By Office of the Commission Secretary at 10:14 am, Apr 22, 2020*

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

April 21, 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

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

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 953 - Hotel Workers for Stronger Communities  
(C90018011)

RESOLUTION TERMS: Certify that a compliance staff representative participated in an FEC conference, webinar, or other training program developed in consultation with the FEC's Information Division; develop and certify the implementation of a policy document to be provided to external vendors detailing communication procedures to ensure timely and accurate reporting of independent expenditures; and pay a civil penalty of \$2,900.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 953 (RAD 19L-43). The ADR Office received this referral on December 6, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred Hotel Workers for Stronger Communities (Respondent) for failing to timely file four (4) 24-Hour Reports totaling \$38,738.35 to support ten (10) independent expenditures disclosed on the 2018 Year-End Report.

The Respondent stated that the omissions were unintentional and inadvertent and resulted from untimely communications during the filing process. The Respondent further stated that in reviewing its activities it discovered the omission in November 2018 and filed amended 24-Hour Reports.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Hotel Workers for Stronger Communities.
2. Approve the appropriate letters.
3. Close the file on this matter.