

**RECEIVED***By Office of the Commission Secretary at 4:16 pm, Apr 16, 2020*

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

April 16, 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 956 - It Starts Today and Jonathan Zucker, Treasurer  
(C00630012)

RESOLUTION TERMS: Perform an annual internal audit and reconciliation for two years; develop and certify implementation of a compliance operations manual; certify that a representative of the Committee participated in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division; and pay a civil penalty of \$5,450.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 956 (RAD 20L-02). The ADR Office received this referral on January 16, 2020.

**SUMMARY:** The Reports Analysis Division (RAD) referred It Starts Today and Jonathan Zucker, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on the 2018 October Monthly Report, originally filed on October 13, 2018. On August 9, 2019, the Committee filed an Amended 2018 October Monthly Report including \$142,066.12 in additional receipts.

The Committee stated that the failure to disclose all financial activity was the result of a clerical error. The Committee additionally stated that they have since

implemented more rigorous procedures to identify and correct any subsequent errors.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of It Starts Today and Jonathan Zucker, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.