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By Office of the Commission Secretary at 10:50 am, Sep 04, 2020

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463**SENSITIVE****MEMORANDUM**

September 4, 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 963 - Communities for a New California C4
(C90018573)

RESOLUTION TERMS: Develop and certify the implementation of a policy document to be provided to external compliance vendors detailing procedures to ensure timely and accurate reporting of independent expenditures; certify that a representative participated in an FEC training; and pay a civil penalty of \$6,400.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 963 (RAD 20L-07). The ADR Office received this referral on April 28, 2020.

SUMMARY: The Reports Analysis Division (RAD) referred Communities for a New California C4 (Respondent) for failing to timely file two (2) 48-Hour Reports to support ninety (90) independent expenditures totaling \$128,297.81 disclosed in the 2018 Year-End Report.

On July 31, 2019, the Respondent filed a Form 99 (Miscellaneous Electronic Submission) stating that the late filing was an oversight. In addition, the

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Respondent stated that it immediately prepared and filed the report upon identifying the filing requirement.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Communities for a New California C4.
2. Approve the appropriate letters.
3. Close the file on this matter.