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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

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.