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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

September 15, 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 968 - Friends of John Delaney and Edward P.  
Nordberg, Jr., Treasurer (C00508416)

RESOLUTION TERMS: Certify that a representative participated in an FEC training  
and pay a civil penalty of \$5,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 968 (RAD 20L-10). The ADR Office received this referral on June 8, 2020.

**SUMMARY:** The Reports Analysis Division (RAD) referred Friends of John Delaney and Edward P. Nordberg, Jr., Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2019 Year-End Report, originally filed on January 31, 2020. On February 20, 2020, the Committee filed an Amended 2019 Year-End Report including \$428,570 in additional in-kind contributions. On the 2020 February Monthly Report, filed February 20, 2020, the Committee reported an offset of \$125,802.25 for a refund of a previous over charge.

In a Form 99 (Miscellaneous Electronic Submission), filed on March 2, 2020, the Committee stated that the offset disclosed on the 2020 February Monthly Report was a refund for an overpayment related to the in-kind contribution from the candidate reported on the Amended 2019 Year-End Report.

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During negotiations on August 5, 2020, the Respondents stated that the failure to disclose all financial activity related to the in-kind contribution was due to a clerical error. Further, Respondents stated that an amended report was filed as soon as the related reporting errors were discovered.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Friends of John Delaney and Edward P. Nordberg, Jr., Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.