

RECEIVED

By Office of the Commission Secretary at 11:15 am, Oct 02, 2020



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

October 2, 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 973 - GRIT PAC and Robert Phillips, III, Treasurer
(C00717421)

RESOLUTION TERMS: 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; certify that a representative participated in an FEC training; and pay a civil penalty of \$1,900.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 973 (RAD 20L-16). The ADR Office received this referral on August 14, 2020.

SUMMARY: The Reports Analysis Division (RAD) referred GRIT PAC and Robert Phillips, III, Treasurer (Respondents or the Committee) for failing to timely file one (1) 24-Hour Report totaling \$25,214 to support one (1) independent expenditure disclosed on the 2020 April Quarterly Report.

In a Form 99 (Miscellaneous Electronic Submission) filed on May 1, 2020, the Committee stated that it failed to file the report during a heavy primary schedule.

Recommendation to Approve
Negotiated Settlement
ADR 973 (RAD 20L-16)
Page 1

The Committee additionally noted the error was self-reported and the report was filed upon discovery of the error.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of GRIT PAC and Robert Phillips, III, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.