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By Office of the Commission Secretary at 10:57 am, Mar 10, 2021

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

March 10, 2021

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 979 - Montana Rural Voters (C90019571)

RESOLUTION TERMS: Pay a civil penalty of \$7,745.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 979 (RAD 20L-21). The ADR Office received this referral on October 21, 2020.

**SUMMARY:** The Reports Analysis Division (RAD) referred Montana Rural Voters (Respondent) for failing to file one (1) 48-Hour Report totaling \$109,008.21 to support three (3) independent expenditures and three (3) 24-Hour Reports totaling \$30,614.47 to support four (4) independent expenditures disclosed in the 2018 Year-End Report.

The Respondent filed a Form 99 (Miscellaneous Electronic Submission) on March 4, 2020, acknowledging the error and explaining that the confusion in filing the 24- and 48-Hour Reports was due to a misunderstanding of independent expenditure reporting requirements and confusion regarding the Respondent's operation as an entity making independent expenditures that is not registered as a political committee with the FEC. Respondent contends that remedial measures have been implemented to prevent errors of this nature from occurring in the future. Specifically, Respondent hired a compliance firm to assist with their filings and

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have developed and implemented a compliance manual. Lastly, a staff member who oversees the organization's compliance attended two (2) FEC webinar trainings in 2020 to ensure future compliance.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Montana Rural Voters.
2. Approve the appropriate letters.
3. Close the file on this matter.