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By Office of the Commission Secretary at 3:34 pm, Feb 10, 2021



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

February 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

Joshua A. Rebollozo *JAR*  
ADR Specialist, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 981 - ActBlue and Erin Hill, Treasurer (C00401224)

RESOLUTION TERMS: Develop and certify implementation of a policy document detailing the process to ensure that receipts are timely reviewed for excessive contributions; perform and certify completion of an internal audit and reconciliation for the 2019-2020 election cycle to identify and remedy any additional excessive contributions; and pay a civil penalty of \$3,300.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 981 (RAD 20L-22). The ADR Office received this referral on October 29, 2020.

**SUMMARY:** The Reports Analysis Division (RAD) referred ActBlue and Erin Hill, Treasurer (Respondent or the Committee) for failing to remedy excessive receipts totaling \$43,676.10 within the permissible timeframe. The entire amount was subsequently refunded outside of the permissible timeframe.

The Committee states that it has identified and corrected the procedural oversight that resulted in the failure to identify excessive contributions and has additionally enhanced its ability to detect over the limit contributions.

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**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of ActBlue and Erin Hill, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.