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By Office of the Commission Secretary at 10:29 am, Mar 30, 2021



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

March 30, 2021

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP*

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 984 - American Values PAC Inc. and Chris Marston,  
Treasurer (C00623371)

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$2,250.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 984 (RAD 20L-23). The ADR Office received this referral on November 17, 2020.

**SUMMARY:** The Reports Analysis Division (RAD) referred American Values PAC Inc. and Chris Marston, Treasurer (Respondents or the Committee) for failing to timely file one (1) 24-Hour Report totaling \$30,000 to support one (1) independent expenditure disclosed on the 2020 July Quarterly Report.

On September 8, 2020, the Committee filed an Amended 2020 July Quarterly Report including memo text stating that the staff arranging the expenditure misunderstood the reporting requirement and failed to notify the Treasurer of the expenditure until the invoice was received. The Committee further states that the expenditure was reported upon receipt and payment of the invoice. In addition,

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during negotiations the Committee noted that it has since implemented a new web-based system to track future independent expenditures.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of American Values PAC Inc. and Chris Marston, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.