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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

April 5, 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 985 - PROTECTING OUR VOTE PAC and Kimberly
A. Woodard, Treasurer (C00509463)

RESOLUTION TERMS: Develop and certify the implementation of a policy document detailing communication procedures to ensure timely and accurate reporting of independent expenditures; retain an outside consultant to review its compliance procedures and conduct a training with those responsible for preparing and filing its reports; and pay a civil penalty of \$3,650.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 985 (RAD 20L-24). The ADR Office received this referral on November 17, 2020.

SUMMARY: The Reports Analysis Division (RAD) referred PROTECTING OUR VOTE PAC and Kimberly A. Woodard, Treasurer (Respondents or the Committee) for failing to timely file five (5) 24-Hour Reports totaling \$48,623.21 to support ten (10) independent expenditures disclosed on the 2020 July Quarterly Report.

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On September 16, 2020, the Committee filed an Amended 2020 July Quarterly Report including memo text stating that it was unable to timely file the 24-Hour Reports due to the sudden unavailability of staff on the dissemination date of the expenditures. Further, the Committee states that it has since implemented safeguards to avoid similar errors in the future.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of PROTECTING OUR VOTE PAC and Kimberly A. Woodard, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.