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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

March 12, 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 987 - RURAL FREEDOM NETWORK and Sherwood  
Guernsey, Treasurer (C00647966)

RESOLUTION TERMS: Retain an outside consultant to review its compliance  
procedures and conduct an on-site training and pay a civil  
penalty of \$2,275.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 987 (RAD 20L-27). The ADR Office received this referral on November 23, 2020.

**SUMMARY:** The Reports Analysis Division (RAD) referred RURAL FREEDOM NETWORK and Sherwood Guernsey, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$45,518 to support two (2) independent expenditures disclosed on the 2020 July Quarterly Report.

The Committee filed a Form 99 (Miscellaneous Electronic Submission) on September 14, 2020 acknowledging it failed to timely file the 48-Hour Report and further stating the error was caused by an internal miscommunication. In response, the Committee implemented a process to communicate expenditures to ensure this oversight does not occur again in the future.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of RURAL FREEDOM NETWORK and Sherwood Guernsey, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.