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**SENSITIVE**

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

June 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*
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 997 - Denali Leadership PAC and Kimberly VanWyhe, Treasurer (C00438291)

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 \$5,150.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 997 (RAD 21L-06). The ADR Office received this referral on February 25, 2021.

SUMMARY: The Reports Analysis Division (RAD) referred Denali Leadership PAC and Kimberly VanWyhe, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2020 October Monthly Report, originally filed on October 20, 2020. On November 4, 2020, the Committee filed an Amended 2020 October Monthly Report including \$100,702 in additional disbursements.

In a Form 99 (Miscellaneous Electronic Submission) filed on January 21, 2021, the Committee stated the checks were inadvertently omitted from the initial October Monthly Report and were ultimately disclosed after reconciling the October bank

statements. The Committee additionally stated that it has since implemented additional accounting procedures to ensure future compliance.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Denali Leadership PAC and Kimberly VanWyhe, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.