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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

May 23, 2023

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 1098 - Results for NC, Inc. and Charles Gantt,
Treasurer (C00545152)

RESOLUTION TERMS: Certify that a representative of the Committee participated
in an FEC training and pay a civil penalty of \$5,600.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1098 (RAD 23L-03). The ADR Office received this referral from the Reports Analysis Division (RAD) on February 14, 2023.

SUMMARY: RAD referred Results for NC, Inc. and Charles Gantt, Treasurer (Respondents or the Committee) for failing to file and timely file two (2) 24-Hour Reports to support two (2) independent expenditures, totaling \$74,950, disclosed on the 2022 July Quarterly Report. On May 17, 2022, the Committee filed one (1) 24-Hour Report to untimely support one (1) independent expenditure totaling \$70,000; however, the Committee failed to file a 24-Hour Report to support the remaining independent expenditure totaling \$4,950.

During negotiations, the Committee stated the reports were not filed due to internal miscommunications and a lack of oversight. In response, the Committee stated it has reviewed and improved its procedures, including implementing layers of

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experienced oversight to review transactions for accuracy and to ensure there are no miscommunications.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Results for NC, Inc. and Charles Gantt, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.