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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

June 20, 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

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1105 – Stand for NH PAC and  
Chris Marston, Treasurer (C00799460)

RESOLUTION TERMS: Certify closure of the Committee's federal account and  
terminate its political committee status; and pay a civil  
penalty of \$5,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1105 (RAD 23L-11). The ADR Office received this referral from the Reports Analysis Division (RAD) on March 29, 2023.

**SUMMARY:** RAD referred Stand for NH PAC and Chris Marston, Treasurer (Respondents or the Committee) for failing to file one (1) 24-Hour Report to support three (3) independent expenditures disseminated on September 6, 2022, totaling \$66,950 disclosed on the 2022 October Quarterly Report. A 24-Hour Report was never filed to support the expenditure.

During negotiations, Respondents stated that the omission was the result of an administrative oversight. In particular, Respondents stated that they thought the report was uploaded but realized during negotiations that they never received a

confirmation email. The Committee additionally noted that it intends to terminate its political committee status upon resolution of this matter.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Stand for NH PAC and Chris Marston, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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<sup>1</sup> The ADRO confirmed with the Electronic Filing Office (EFO) that there were no issues with FEC servers at the time and no record of upload errors for the Committee.