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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

October 4, 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 1119 - Latinos for America First and
Moni Casarez, Treasurer (C00685776)

RESOLUTION TERMS: Certify annually, for two years, that the Committee continued to retain the services of a compliance team, certify that a representative of the Committee participated in an FEC training program, and pay a civil penalty in the amount of \$9,500 paid over 180 days.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1119 (AD A21-12). The ADR Office received this referral from the Audit Division on June 22, 2023.

SUMMARY: The Audit Division referred Latinos for America First and Moni Casarez, Treasurer (Respondents or the Committee) for two (2) findings from the Final Audit Report of the Commission, as approved on June 12, 2023. Finding 2 states that the Committee understated its receipts and disbursements in the amount of \$336,184, on reports filed prior to audit notification, over the two-year reporting period ending December 31, 2020. Finding 3 states that the Committee failed to disclose or inadequately disclosed occupation and/or name of employer information for 129 contributions, from individuals, totaling \$39,340.

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During negotiations, Respondents acknowledged that there were reporting challenges during the 2019-2020 election cycle that were caused, in part, by the inexperience of a volunteer treasurer. The Committee filed amended disclosure reports to disclose occupation and/or name of employer information that materially corrected the public record and stated that they have since hired an FEC compliance officer and a finance director to ensure future compliance.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Latinos for America First and Moni Casarez, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.