



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

November 2, 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 1121 - GOA Victory Fund and John Velleco, Treasurer
(C00817122)

RESOLUTION TERMS: Complete internal training with Committee staff regarding independent expenditure reporting procedures, including internal communication protocols when expenditures are authorized, to ensure timely and accurate reporting and pay a civil penalty of \$3,750.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1121 (RAD 23L-31). The ADR Office received this referral from the Reports Analysis Division (RAD) on June 27, 2023.

SUMMARY: RAD referred GOA Victory Fund and John Velleco, Treasurer (Respondents or the Committee) for failing to timely file one (1) 24-Hour Report to support one (1) independent expenditure disseminated on November 30, 2022, totaling \$50,000, disclosed on the 2022 Year-End Report. On December 8, 2022, the Committee filed one (1) 24-Hour Report to support the independent expenditure, albeit untimely.

On May 22, 2023, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating the report was not timely filed because the vendor failed to send a timely invoice. Further, the Committee stated that staff members responsible for preparing the reports did not receive any notification of dissemination of the independent expenditure until the invoice was received on December 7, 2022.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of GOA Victory Fund and John Velleco, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.