

**RECEIVED**

By Office of the Commission Secretary at 10:42 am, Sep 18, 2023



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

September 18, 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 1123 - Hung Cao for Virginia and Steve Martin,  
Treasurer (C00802488)

RESOLUTION TERMS: Certify that a representative of the Committee participated  
in an FEC training and pay a civil penalty of \$2,100.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1123 (RAD 23L-33). The ADR Office received this referral from the Reports Analysis Division (RAD) on July 5, 2023.

**SUMMARY:** RAD referred Hung Cao for Virginia and Steve Martin, Treasurer (Respondents or the Committee) for failing to remedy excessive and prohibited 2022 General Election contributions, totaling \$28,195, within the permissible timeframes. The Committee remedied all of these contributions outside of the permissible timeframe.

During negotiations, the Committee acknowledged the errors and stated they arose as the result of both procedural and technical challenges it faced. In particular, the Committee attributes the errors to its software failing to correctly identify duplicate donors, procedural difficulties with timely remedying prohibited contributions, and challenges related to transitioning compliance management firms during the

election year. The Committee has since implemented new policies and procedures to rectify future errors.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Hung Cao for Virginia and Steve Martin, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.