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By Office of the Commission Secretary at 10:56 am, Mar 13, 2024

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463**SENSITIVE****MEMORANDUM**

March 13, 2024

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 1148 - Michigan Liberation Action Fund and RaiAda
LaNier, Treasurer (C00690776)

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual which includes procedures for disclosing independent expenditures and internal controls; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$7,775.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1148 (RAD 23L-63). The ADR Office received this referral from the Reports Analysis Division (RAD) on October 25, 2023.

SUMMARY: RAD referred Michigan Liberation Action Fund and RaiAda LaNier, Treasurer (Respondents or the Committee) for failing to timely file fourteen (14) 24-Hour Reports to support forty-two (42) independent expenditures disseminated from July 18, 2022 through July 31, 2022, totaling \$37,537.12. On March 22, 2023, the Committee filed 24-Hour Reports to support forty (40) of the expenditures. Two (2) of the 24-Hour Reports were amended on March 23, 2023, to support the remaining two (2) additional expenditures.

RAD additionally referred Respondents for failing to file one (1) 24-Hour Report to support four (4) independent expenditures disseminated on October 23, 2022, totaling \$2,882.09, and for failing to timely file seventeen (17) 24-Hour Reports to support eighty (80) independent expenditures disseminated between October 20, 2022, and November 6, 2022, totaling \$64,260.02. On March 22, 2023, the Committee filed 24-Hour Reports to support seventy-nine (79) of the expenditures. An Amended 24-Hour Report was filed on March 23, 2023, to support one (1) additional expenditure.

During negotiations, Respondents stated that the failure to file 24-Hour Reports was due to understaffing and not fully understanding independent expenditure reporting requirements. Respondents state that they have since hired additional staff to assist with their filings.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Michigan Liberation Action Fund and RaiAda LaNier, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.