



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 31, 2022

Erin Clark, Esq.
6750 Westown Parkway #200-156
West Des Moines, IA 50266

Re: ADR 1044 (P-MUR 644)
NRCC and Keith A. Davis, Treasurer (C00075820)

Dear Erin Clark, Esq.:

On November 9, 2020, the Federal Election Commission (FEC/Commission) received your *sua sponte* submission acknowledging certain violations of the Federal Election Campaign Act of 1971, as amended.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and dismiss the matter. In its memorandum to the Commission, dated January 27, 2022, this office stated:

Summary and Analysis of Case: On November 9, 2020, NRCC and Keith A. Davis, Treasurer, (Respondents or the Committee) filed a *sua sponte* submission stating that the Committee failed to report an independent expenditure totaling \$17,894.57 on a 24-Hour Report because of an administrative oversight. The Committee indicates that its advance payment of the expenditure prior to the dissemination of the ad was a complicating issue. The Committee states that it filed an amended 24-Hour Report on November 6, 2020, when it became aware of the error. The Committee further states that it implemented a procedure to cross-check advance payments with all independent expenditure ads to prevent a reoccurrence of this error. Based on the foregoing, the ADRO recommends the Commission exercise prosecutorial discretion and dismiss the matter. *Heckler v. Chaney* 470 U.S. 821 (1985).

Accordingly, the Commission closed its file in this matter on March 22, 2022.

The FEC is obligated by federal regulations to make a finding to terminate its proceedings public, as well as the basis therefore. 11 C.F.R. § 111.20. In addition, the Commission will also place on the record copies of the complaint, correspondence exchanged between Respondents and the Commission, and reports prepared for the Commission by this office to assist in its consideration of this matter. Accordingly, copies

of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

Sincerely,

A handwritten signature in black ink, appearing to read "KJ Roche", with a stylized flourish extending to the right.

Krista J. Roche
Director
Alternative Dispute Resolution Office