

**RECEIVED**

By Office of the Commission Secretary at 9:49 am, Apr 12, 2022



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

April 12, 2022

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 1070 - Nancy Mace for Congress and Paul Kilgore,  
Treasurer (C00710103)

RESOLUTION TERMS: Develop and certify implementation of a compliance operations manual; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$4,350.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1070 (RAD 22L-01). The ADR Office received this referral on January 6, 2022.

**SUMMARY:** The Reports Analysis Division (RAD) referred Nancy Mace for Congress and Paul Kilgore, Treasurer (Respondents or the Committee) for failing to remedy excessive and prohibited 2020 Primary and General Election contributions totaling \$58,200 within the permissible timeframe. The Committee refunded all excessive and prohibited contributions outside the permissible timeframe.

In response to Requests for Additional Information (RFAs) from RAD, the Committee filed a Form 99 (Miscellaneous Electronic Submission) on September 6, 2019, and included additional memo text with its reports filed on September 21,

Recommendation to Approve  
Negotiated Settlement  
ADR 1070 (RAD 22L-01)  
Page 1

2020; December 7, 2020; and June 18, 2021. The Committee states it has procedures in place for contributions that exceed a donor's contribution limit and for contributions from apparent business entities. In particular, it attempts to reattribute excessive contributions, but if no response is received within 60 days, it processes a refund. Additionally, the Committee processes refunds for contributions from apparent business entities that cannot be verified as contributions from non-corporate funds. During negotiations, the Committee noted the excessive and prohibited contributions were received at a busy time and thus failed to be remedied timely.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Nancy Mace for Congress and Paul Kilgore, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.