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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

March 21, 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 1062 and ADR 1075 - America Great PAC and Jason
Pallante, Treasurer (C00705384)

RESOLUTION TERMS: Develop and certify implementation of a process to track receipt of, and response to, communications with the Commission; perform an annual internal audit and reconciliation for two years; certify that a representative of the Committee participated in an FEC training; and pay a combined civil penalty of \$9,325.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1062 (AD A21-16) and ADR 1075 (RAD 22L-09). The ADR Office received these referrals on November 4, 2021 and February 25, 2022, respectively.

SUMMARY: The Reports Analysis Division (RAD) referred Respondents for a series of reporting errors and other FECA violations during the 2019-2020 election cycle. The Committee's errors included, among other items: excessive, prohibited, and other impermissible contributions/transfers; failure to provide supporting schedules; failure to properly itemize contributions from individuals; and failure to properly itemize disbursements.

Recommendation to Approve
Negotiated Settlement
ADR 1062 (AD A21-16) &
ADR 1075 (RAD 22L-09)
Page 1

RAD additionally referred Respondents for failing to disclose all financial activity on its 2021 Mid-Year Report, originally filed on July 27, 2021. On October 15, 2021, the Committee filed an Amended 2021 Mid-Year Report, including \$137,019.40 in additional disbursements.

On February 10, 2022, February 23, 2022, March 9, 2022, and March 17, 2022, the Committee filed Form 99s (Miscellaneous Electronic Submissions) to address the additional disbursements and correct its 2019-2020 election cycle reporting errors. RAD reviewed the filings and determined that no further corrective action is required for the 2019-2020 election cycle. Regarding the additional reported disbursements, the Committee states the issue was the result of staff inexperience with campaign finance reporting.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of America Great PAC and Jason Pallante, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.