

**RECEIVED***By Office of the Commission Secretary at 7:38 am, Jun 17, 2022*

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

June 17, 2022

TO: The Commission

THROUGH: Alec Palmer AP by *KAH*  
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 1079 - JASON LEWIS FOR SENATE and Bradley  
Crate, Treasurer (C00716860)

RESOLUTION TERMS: Certify that a representative of the Committee participated  
in an FEC training and pay a civil penalty of \$7,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1079 (RAD 22L-11). The ADR Office received this referral on March 9, 2022.

**SUMMARY:** The Reports Analysis Division (RAD) referred JASON LEWIS FOR SENATE and Bradley Crate, Treasurer (Respondents or the Committee) for failing to remedy excessive and prohibited 2020 primary and general election contributions totaling \$93,700 within the permissible timeframe. The Committee refunded all excessive and prohibited contributions outside the permissible timeframe.

During negotiations, the Committee stated that the failure to remedy excessive and prohibited contributions were caused by issues relating to the merging of the Committee's donor records, which prevented the Committee's external compliance vendor from promptly identifying certain excessive contributions. Additionally, diminished oversight in timely remedying contributions occurred amid the height

of the 2020 general election. The Committee further noted its external compliance vendor has policies and safeguards to identify and remedy excessive contributions and to ensure that contributions are made by eligible contributors with federally permissible funds.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of JASON LEWIS FOR SENATE and Bradley Crate, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.