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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

December 1, 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 1087 - Weber for Congress and Robert D. Nolen,  
Treasurer (C00502229)

RESOLUTION TERMS: Develop and certify implementation of a policy document detailing the Committee's process to ensure receipts are timely reviewed and all excessive contributions are timely remedied; develop and certify implementation of a compliance operations manual which includes internal controls; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$3,825.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1087 (AD A21-02). The ADR Office received this referral from the Audit Division on August 25, 2022.

**SUMMARY:** The Audit Division referred Weber for Congress and Robert D. Nolen, Treasurer (Respondents or the Committee) for one (1) finding detailed in the Final Audit Report of the Commission, as approved on August 18, 2022. The Commission approved a finding that the Committee received excessive

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contributions from individuals totaling \$51,212 in the 2019-2020 election cycle. The Committee materially resolved the excessive contributions, albeit untimely.

Respondents untimely resolved excessive contributions by sending presumptive letters to contributors identified in its review of 2019-2020 election cycle receipts, as well as in response to those excessive contributions identified during the FEC audit. During negotiations, the Committee acknowledged the violation and stated it failed to timely send presumptive letters. Further, the Committee has hired an external compliance firm to assist with future filings.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Weber for Congress and Robert D. Nolen, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.