



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 10, 2023

Paul Kilgore, Treasurer  
Pennsylvania Conservative Fund  
824 S Milledge Ave, Ste 101  
Athens, GA 30605

**Response Due Date**  
**May 1, 2023**

Re: ADR 1104 (RAD 23L-10)  
Pennsylvania Conservative Fund and Paul Kilgore, Treasurer (C00802793)

Dear Paul Kilgore:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Reports Analysis Division (RAD) was based on a review of reports filed by Pennsylvania Conservative Fund which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with Pennsylvania Conservative Fund and Paul Kilgore, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

RAD referred Pennsylvania Conservative Fund and Paul Kilgore, Treasurer (Respondents or the Committee) for failing to file one (1) 48-Hour Report totaling \$210,330.00 to support one (1) independent expenditure disclosed on its 2022 Termination Report. The 48-Hour Report has not yet been filed.

In a Form 99 (Miscellaneous Electronic Submission) filed on August 23, 2022, the Committee stated it failed to file the 48-Hour Report due to an administrative oversight. The Committee further stated it included the expenditure in its Amended 2022 Termination Report and states all outstanding independent expenditures have been publicly reported by the Committee.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days from the date of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing.

This matter has been designated as **ADR 1104**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua Rebollozo".

Joshua A. Rebollozo  
Assistant Director  
Alternative Dispute Resolution Office