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By Office of the Commission Secretary at 10:47 am, Jun 12, 2023

**SENSITIVE**

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

June 12, 2023

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 1104 - Pennsylvania Conservative Fund and Paul Kilgore, Treasurer (C00802793)

RESOLUTION TERMS: Certify closure of the Committee's federal account and terminate its political committee status; and pay a civil penalty of \$10,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1104 (RAD 23L-10). The ADR Office received this referral from the Reports Analysis Division (RAD) on March 28, 2023.

SUMMARY: RAD referred Pennsylvania Conservative Fund and Paul Kilgore, Treasurer (Respondents or the Committee) for failing to file one (1) 48-Hour Report to support one (1) independent expenditure disseminated on April 1, 2022, totaling \$210,330, disclosed on its Amended 2022 Termination Report, filed on July 11, 2022. A 48-Hour Report was never filed to support the expenditure.

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 that all outstanding independent expenditures have been publicly reported.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Pennsylvania Conservative Fund and Paul Kilgore, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.