

**RECEIVED**

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

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463**SENSITIVE****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

Recommendation to Approve  
Negotiated Settlement  
ADR 1104 (RAD 23L-10)  
Page 1

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.