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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

February 28, 2024

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 1146 - Americans for Constitutional Liberty dba The
Conservative Caucus (C90018904)

RESOLUTION TERMS: Develop and certify implementation of a compliance
operations manual, which includes procedures for disclosing
independent expenditures and internal controls; certify that
a representative of the Respondent participated in an FEC
training; and pay a civil penalty of \$7,225.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1146 (RAD 23L-60). The ADR Office received this referral from the Reports Analysis Division (RAD) on October 12, 2023.

SUMMARY: RAD referred Americans for Constitutional Liberty dba The Conservative Caucus (Respondent) for failing to timely file two (2) 48-Hour Reports to support ten (10) independent expenditures disseminated between May 15, 2023, and May 26, 2023, totaling \$144,522.57, disclosed on the 2023 July Quarterly Report. The Respondent filed two 48-Hour Reports on July 14, 2023, to support these independent expenditures, albeit untimely.

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On September 19, 2023, the Respondent filed a Form 99 (Miscellaneous Electronic Submission) stating the Respondent timely transmitted all information to its consultant who was unaware of the 48-hour reporting requirements. Further, the Respondent stated that upon the consultant's discovery of the reporting requirements, the 48-Hour Reports were filed.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Americans for Constitutional Liberty dba The Conservative Caucus.
2. Approve the appropriate letters.
3. Close the file on this matter.