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

SENSITIVE**MEMORANDUM**

April 15, 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 1152 - Make America Great Again, Again! Inc. and
Charles Gant, Treasurer (C00790477)

RESOLUTION TERMS: Develop and certify the implementation and distribution of
a policy document to be provided to the Committee's staff
detailing procedures for identifying in-kind contributions to
ensure timely and accurate reporting and pay \$6,075.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1152 (RAD 23L-68). The ADR Office received this referral from the Reports Analysis Division (RAD) on November 28, 2023.

SUMMARY: RAD referred Make America Great Again, Again! Inc. and Charles Gant, Treasurer (Respondent or the Committee) Respondents for failing to disclose all financial activity on its 2022 April Quarterly Report. On July 31, 2023, the Committee filed an Amended 2022 April Quarterly Report which disclosed \$150,600.31 in additional in-kind contributions received.

On October 10, 2023, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating the additional in-kind contributions were disclosed as a result of an internal audit and reconciliation of the Committee's financial activity which

discovered the previously unreported contributions. During negotiations, the Committee stated the Committee also amended its 2022 April Quarterly Report, 2022 May Monthly Report, 2022 June Monthly Report, 2022 July Monthly Report, 2022 August Monthly Report, 2022 September Monthly Report, 2022 October Monthly Report, 2022 Pre-General Report, 2022 Post-General Report, and 2022 Year-End Report as a result of this review.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Make America Great Again, Again! Inc. and Charles Gant, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.