



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

September 24, 2024

Donald F. McGahn, II, Esq.
51 Louisiana Avenue, N.W.
Washington, DC 20001

Re: ADR 1164 (A21-11)
Madison Project Inc. and Paul Kilgore, Treasurer (C00298000)

Dear Counsel:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on September 17, 2024 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term(s). The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is attached.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

Rosa Marshall

Rosa Marshall
Assistant Director
Alternative Dispute Resolution Office

ADR 1164 Compliance Chart

Type	Date Due
Certify that a representative of the Committee participated in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division	9/17/2025



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Case Number: ADR 1164

Source: AD A21-11

Case Name: Madison Project Inc.

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (FEC or the Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Donald F. McGahn, II, Esq., representing Madison Project Inc. and Paul Kilgore¹, in the official capacity of Treasurer (the Committee or Respondents). It is understood that this settlement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission enters into this settlement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this settlement with the Commission.
3. The Audit Division referred Respondents for one (1) finding detailed in the Final Audit Report of the Commission, as approved on March 26, 2024. The finding states that the Committee failed to disclose or inadequately disclosed the occupation and name of employer information for 514 contributions from individuals, totaling \$184,782, during calendar years 2019 and 2020.
4. The FECA requires that a political committee not authorized by a candidate disclose the identification of all individuals who contribute in excess of \$200 per calendar year. Identification is defined as the contributor's full name, complete mailing address, occupation and name of employer. 52 U.S.C. § 30104(b)(3); 11 C.F.R. §§ 100.12, 104.3(a)(4). If unable to provide the identification of contributors, a committee must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," a committee must provide the Commission with a detailed description of the three-part process pursuant to 11 C.F.R. § 104.7(b).

¹ Kelly Amorin was the treasurer from May 6, 2020, to April 25, 2024. The Committee amended its Statement of Organization (Form 1) on April 26, 2024, to list Paul Kilgore as its treasurer.

5. In response to the audit, the Committee provided Audit with a list of the contributors who were sent follow-up letters requesting missing occupation and name of employer information during 2019 and 2020. The list included 377 contributors, totaling \$130,960. In addition, on May 18, 2023, the Committee filed amended disclosure reports that materially corrected the public record by including the occupation and name of employer information for 134 contributions, totaling \$53,292. Respondents also state that a treasurer, familiar with FEC reporting requirements, has since been reappointed.
6. Respondents, in an effort to avoid similar errors in the future, agree to certify that a representative of the Committee participated in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division within twelve (12) months of the effective date of this settlement.
7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this settlement under penalty of perjury pursuant to 28 U.S.C. § 1746.
8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance. Unpaid civil money penalties are subject to the Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. § 3701 et seq. The Commission will transfer debt to the United States Department of the Treasury (Treasury) for collection.
9. This settlement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this settlement as set forth above and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 1164 (AD A21-11), and resolves those issues identified above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

Rosa Marshall, Assistant Director
Alternative Dispute Resolution Office

Rosa Marshall

9/17/2024

Date Signed

FOR THE RESPONDENTS:

CFM

Donald F. McGahn, II, Esq.
Representing Madison Project Inc.
and Paul Kilgore, Treasurer

August 21, 2024

Date Signed