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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**SENSITIVE****MEMORANDUM**

September 4, 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

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 1165 - Warnock for Georgia and  
Christopher Koob, Treasurer (C00736876)

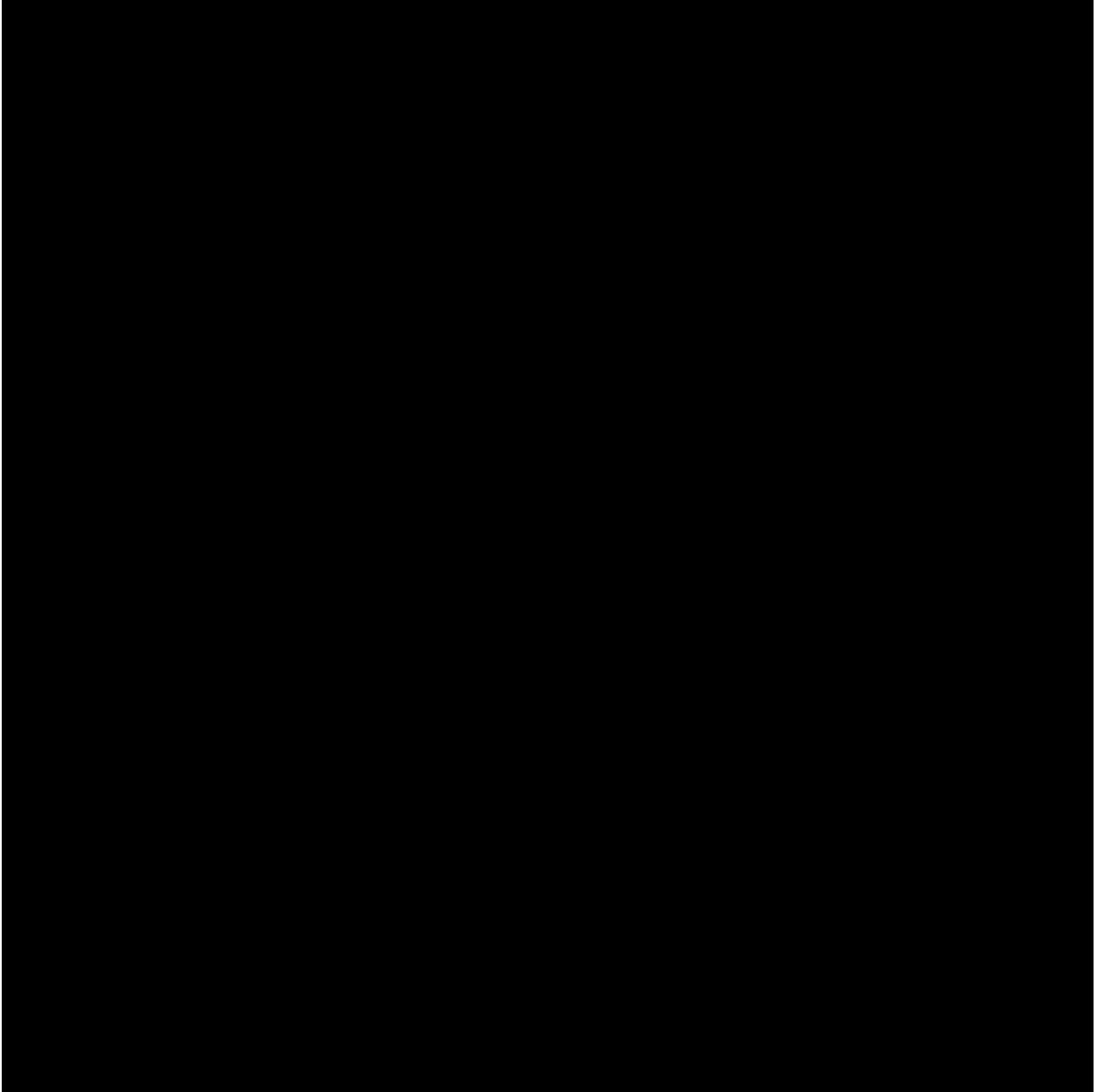
RESOLUTION TERMS: Develop and certify the implementation and distribution of a policy document to be provided to the Committee's external compliance firm detailing the Committee's procedures for identifying and remedying prohibited and excessive contributions; certify that a representative participated in an FEC training; and pay a civil penalty of \$72,350.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1165 (RAD 24L-12). The ADR Office received this referral from the Reports Analysis Division (RAD) on April 16, 2024.

**SUMMARY:** RAD referred Warnock for Georgia and Christopher Koob, Treasurer (Respondents or the Committee) for failing to remedy excessive and prohibited 2020 special general and special general runoff contributions, totaling \$69,919.24, within the permissible timeframes. RAD also referred the Committee for failing to remedy excessive and prohibited 2022 primary, general and general

runoff contributions, totaling \$903,877.51, within the permissible timeframes. All of the excessive and prohibited contributions have been refunded, albeit untimely.

The Committee filed Form 99s (Miscellaneous Electronic Submissions) and amended its disclosure reports to adequately respond to all excessive and prohibited contributions contained in the RAD referral. During negotiations, the Committee highlighted that the contributions in this matter comprise less than 1% of the total contributions the Committee received during the 2019-2020 and 2021-2022 election cycles.



**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Warnock for Georgia and Christopher Koob, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.