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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE**MEMORANDUM**

August 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

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1166 - Team Herschel, Inc and
Salvatore Purpura, Treasurer (C00787853)

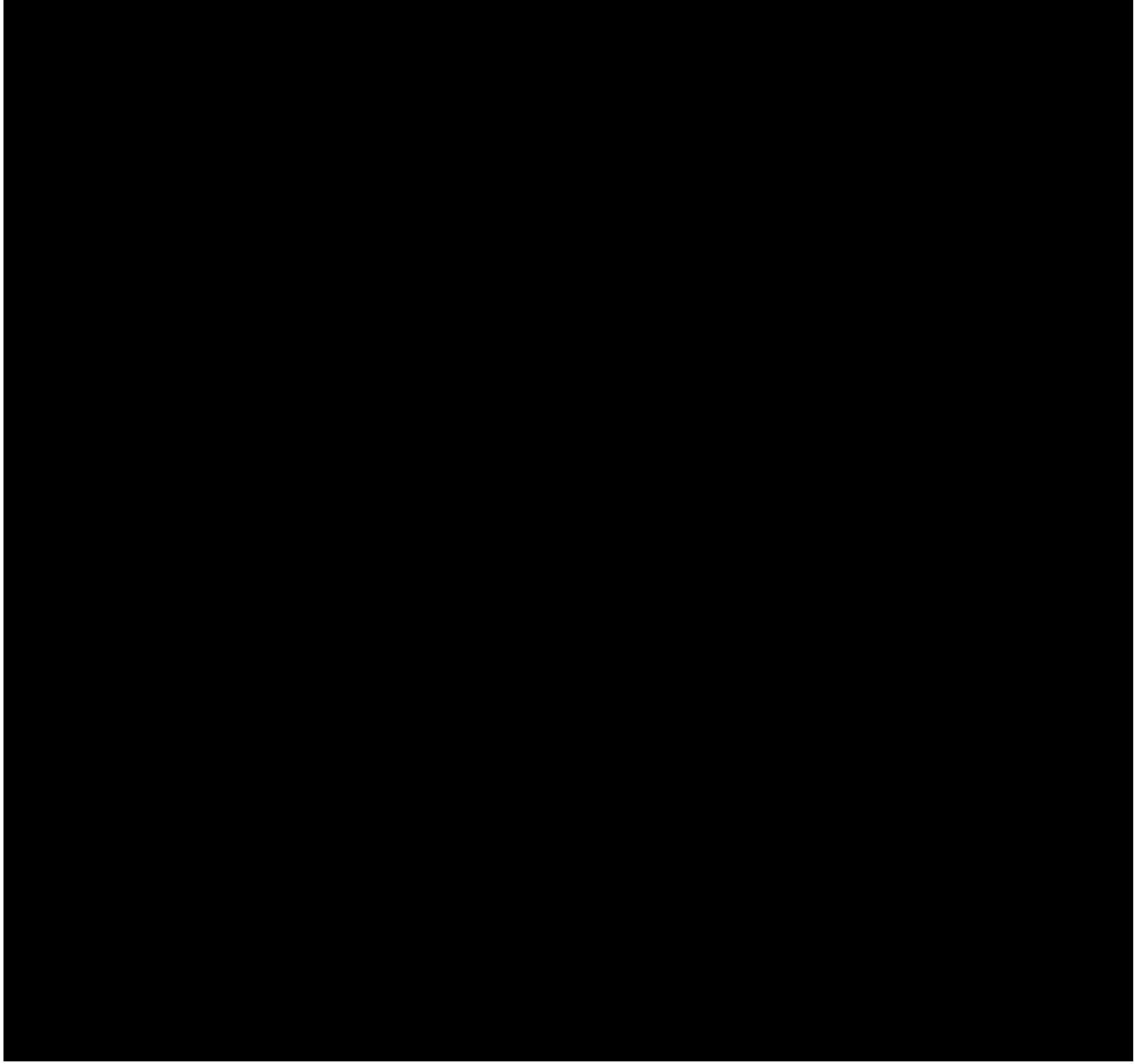
RESOLUTION TERMS: Certify the implementation and distribution of a policy document to be provided to the Committee's staff detailing procedures to ensure that receipts are timely reviewed for excessive and prohibited contributions and pay a civil penalty of \$2,800.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1166 (RAD 24L-13). The ADR Office received this referral from the Reports Analysis Division (RAD) on April 16, 2024.

SUMMARY: RAD referred Team Herschel, Inc and Salvatore Purpura, Treasurer (Respondents or the Committee) for failing to remedy excessive and prohibited 2022 primary, general, and runoff election contributions, totaling \$37,477.70, within the permissible timeframes. The Committee remedied all these contributions outside of the permissible timeframes.

During negotiations, Respondents contended that the issue was caused by unprecedented contributions during the election cycle, for which the prohibited

contributions represent a .0005% error rate. Respondents also note that the excessive and prohibited receipts were remedied upon receiving Requests for Additional Information (RFAs) from RAD.



RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Team Herschel, Inc and Salvatore Purpura, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.