



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

MEMORANDUM

December 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

Joshua A. Rebollozo *JAR*
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1180 - Big Red Leadership PAC and Robert F. Carlin,
Treasurer (C00808121)

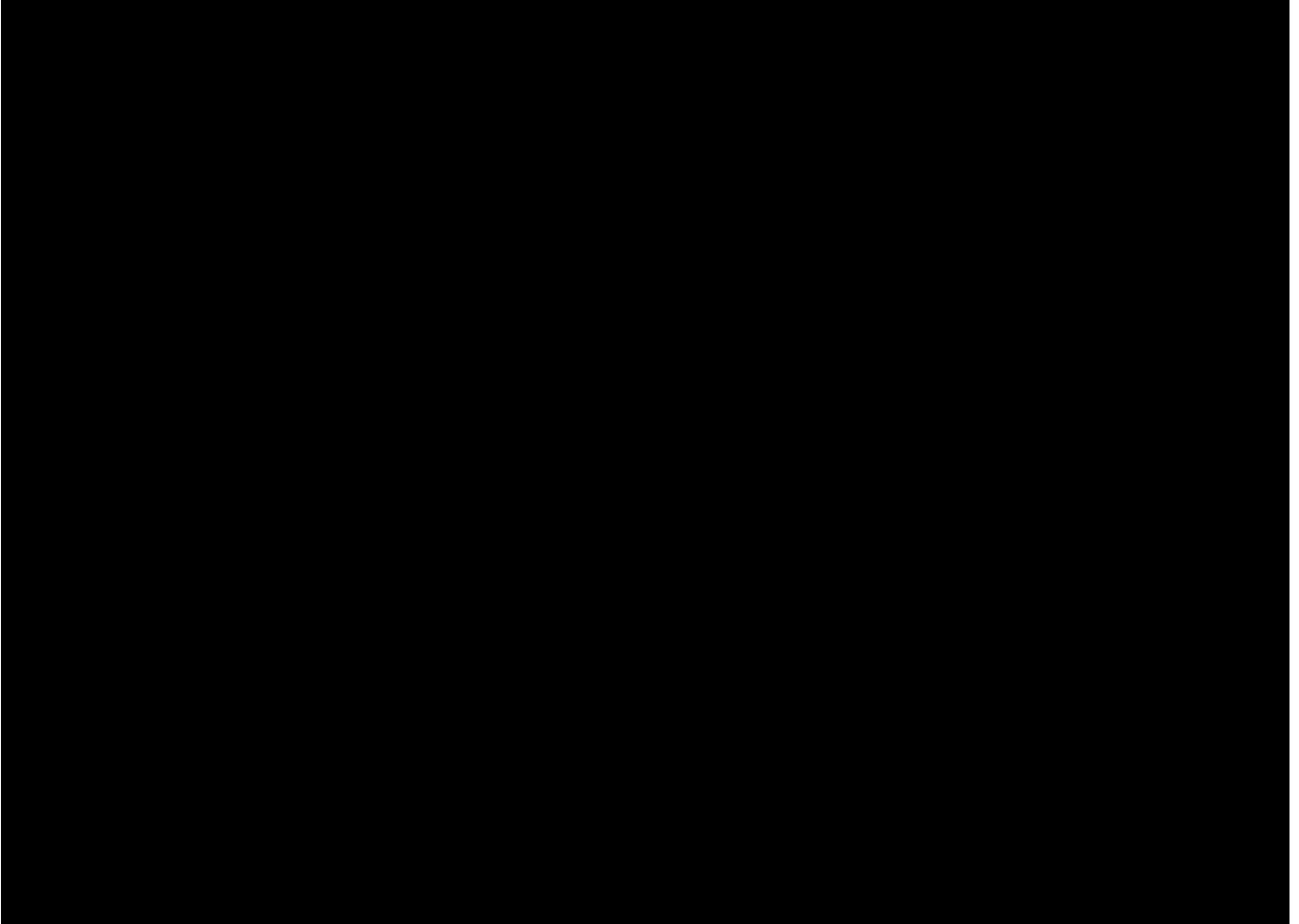
RESOLUTION TERMS: Develop and certify the implementation and distribution of a policy document to be provided to its compliance vendors and staff detailing the Committee's procedures; certify that a representative of the Committee participated in an FEC training; and pay a civil penalty of \$13,450.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1180 (RAD 24L-29). The ADR Office received this referral from the Reports Analysis Division (RAD) on September 3, 2024.

SUMMARY: RAD referred Big Red Leadership PAC and Robert F. Carlin, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report to support two (2) independent expenditures, disseminated on February 29, 2024, totaling \$269,156. On April 3, 2024, the Committee filed one (1) 48-Hour Report to support these independent expenditures.

On April 30, 2024, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating it discovered the error when preparing its 2024 April Quarterly

Report and subsequently filed the 48-Hour Report, albeit untimely. During negotiations, the Committee stated it had timely prepared the 48-Hour Report and believed it was successfully filed.



RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Big Red Leadership PAC and Robert F. Carlin, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.