



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**SENSITIVE**

**MEMORANDUM**

February 21, 2025

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 1188 - Zinke for Congress and Paul Kilgore, Treasurer  
(C00778159)

RESOLUTION TERMS: Certify that a member of the Committee's staff participated  
in an FEC training program and pay a civil penalty of  
\$3,750.

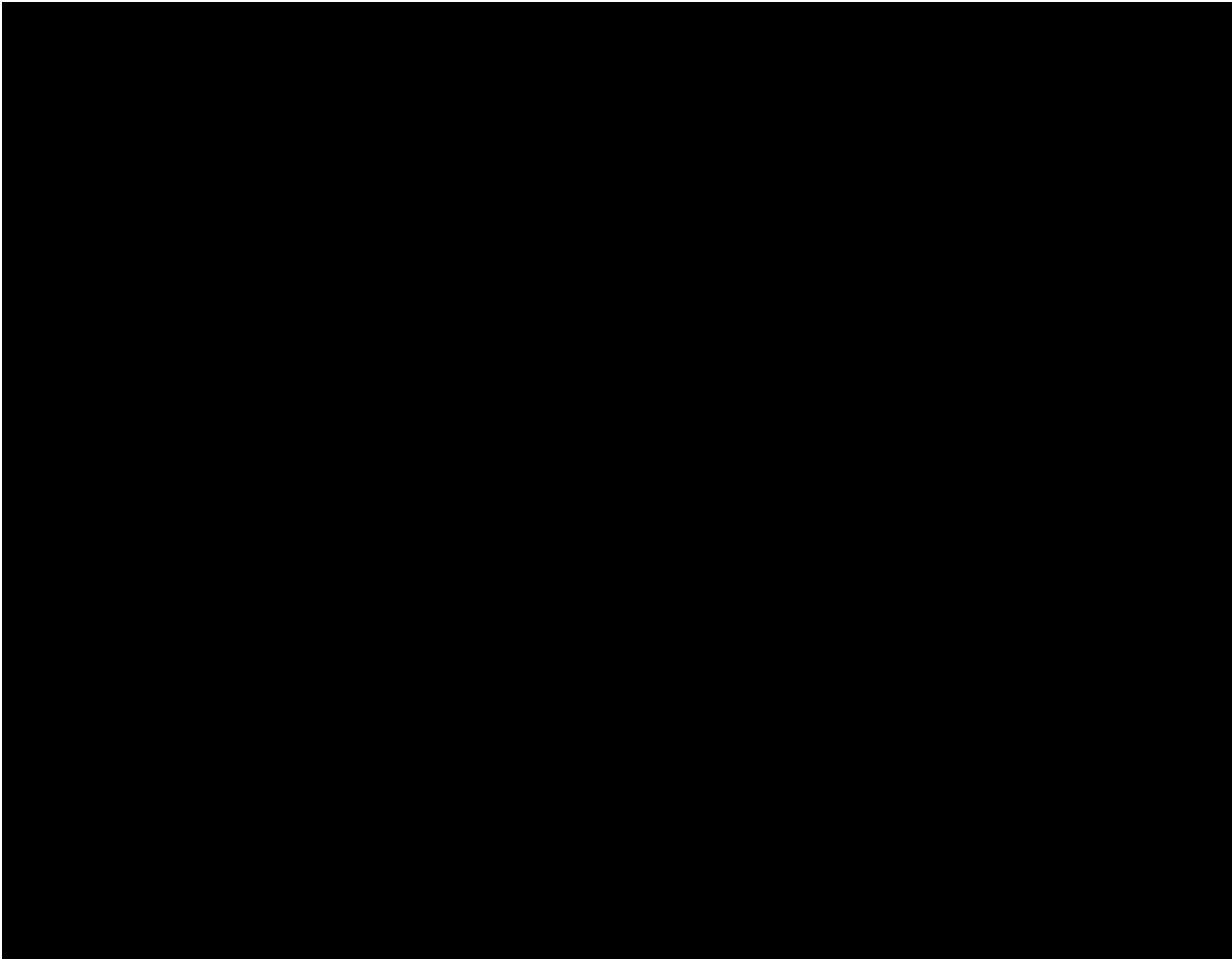
Attached for your review is a signed Negotiated Settlement pertaining to ADR 1188 (RAD 24L-35). The ADR Office received this referral from the Reports Analysis Division (RAD) on October 8, 2024.

**SUMMARY:** RAD referred Zinke for Congress and Paul Kilgore, Treasurer (Respondents or the Committee) for failing to remedy excessive and prohibited 2022 general election contributions, totaling \$49,956.90, within the permissible timeframes. At the time of the referral, \$37,355.40 in contributions had been remedied, albeit untimely, and \$12,601.50 remained unremedied. All contributions have now been remedied, albeit untimely.

The Committee filed a Form 99 (Miscellaneous Electronic Submission) on February 4, 2025, detailing its efforts to remedy the unremedied excessive contributions included in the referral. During negotiations, the Committee stated

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the errors occurred due to staffing changes before the general election and the failure of its filing software to identify duplicate contributors. The Committee stated it implemented improvements to its procedures, including standardizing contributor data before importing the information into its filing software.



**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Zinke for Congress and Paul Kilgore, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.