



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

MEMORANDUM

March 18, 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 1193 - Catherine Cortez Masto for Senate and
Lili Snyder, Treasurer (C00575548)

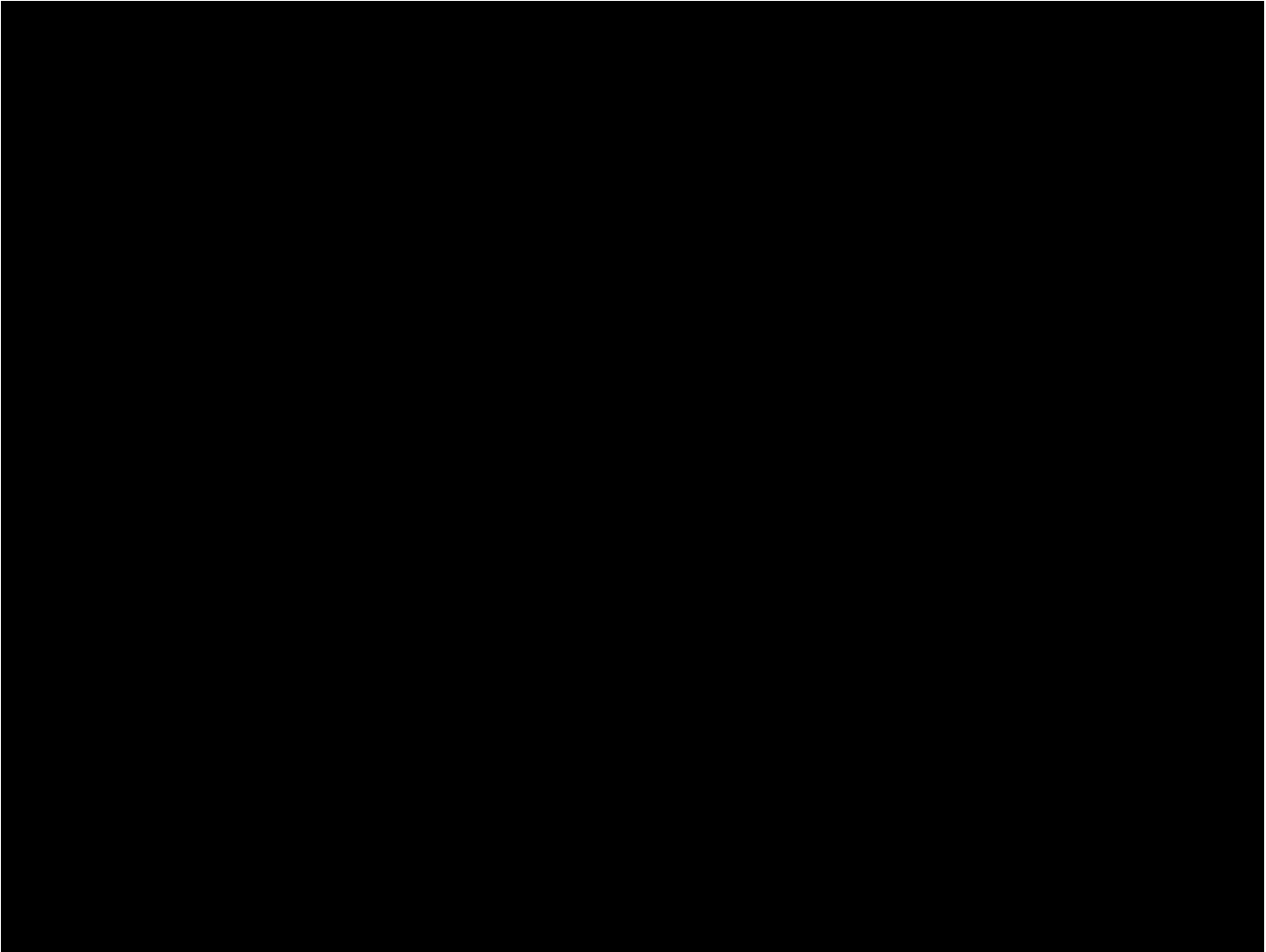
RESOLUTION TERMS: Develop and certify the implementation and distribution of
a policy document detailing the Committee's procedures for
identifying and remedying excessive contributions and pay
a civil penalty of \$2,900.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1193 (RAD 24L-43). The ADR Office received this referral from the Reports Analysis Division (RAD) on November 5, 2024.

SUMMARY: RAD referred Catherine Cortez Masto for Senate and Lili Snyder, Treasurer (Respondents or the Committee) for failing to remedy excessive 2022 primary and general election contributions, totaling \$38,496.72, within the permissible timeframe. The Committee refunded all of these excessive contributions outside of the permissible timeframe.

During negotiations, the Committee acknowledged its failure to timely remedy the excessive contributions, cited in the RAD referral, and stated that the contributions were remedied prior to the date of the referral. The Committee also highlighted that

the contributions in this matter comprise less than 1% of the total contributions the Committee received during the 2021-2022 election cycle. Lastly, the Committee stated it instituted protocols and procedures to ensure that these errors do not reoccur.



RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Catherine Cortez Masto for Senate and Lili Snyder, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.