



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

MEMORANDUM

April 1, 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 1195 - American Principles Project PAC and Anthony
LaBruna, Treasurer (C00544387)

RESOLUTION TERMS: Certify that a representative participated in an FEC training
program; and develop and certify implementation of
procedures to ensure that in-kind contributions are timely
tracked and reported.

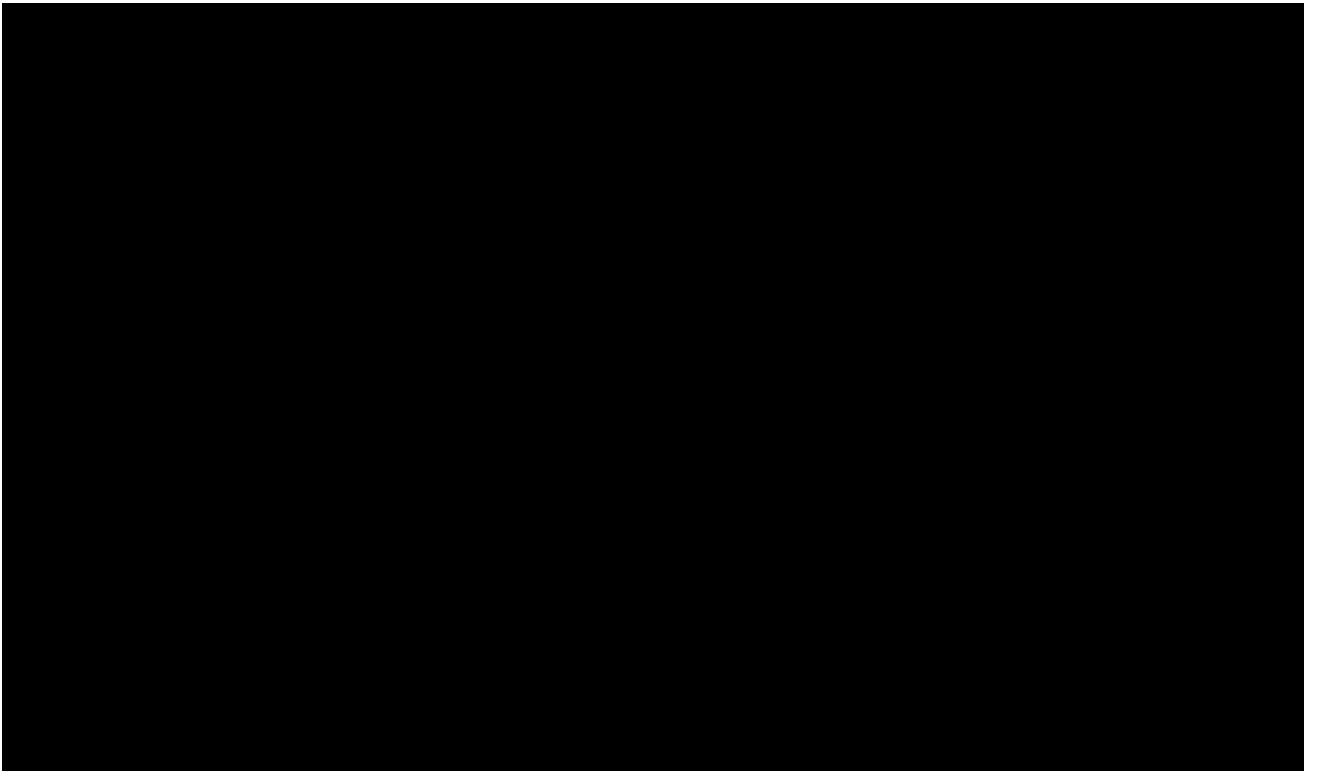
Attached for your review is a signed Negotiated Settlement pertaining to ADR 1195 (RAD 24L-46). The ADR Office received this referral from the Reports Analysis Division (RAD) on November 12, 2024.

SUMMARY: RAD referred American Principles Project PAC and Anthony LaBruna, Treasurer (Respondents or the Committee) for failing to disclose all activity on their 2024 April Quarterly Report. On July 13, 2024, the Committee filed an Amended 2024 April Quarterly Report, which disclosed \$178,262.12 in additional in-kind contributions.

During negotiations, the Committee stated that the activity pertained to recurring administrative expenses contributed by its parent organization that were incurred during the 2023 calendar year. On March 20, 2025, the Committee corrected the

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public record by removing the \$178,262.12 in-kind contribution from their 2024 April Quarterly Report and amending their 2023 semi-annual reports to disclose the administrative expenses incurred during each reporting period.



RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of American Principles Project PAC and Anthony LaBruna, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.