



RECEIVED
FEB 7 2017

2017 FEB - 7 PM 4:22

Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

February 7, 2017

1719004178

TO: The Commission

THROUGH: Alec Palmer *MP/ff*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Lynn M. Fraser *WJ*
Director, ADR Office

SUBJECT: ADR 804 Americans For A Conservative Direction,
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Pay a civil penalty of \$2,550.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 804 (RR 15L-38). The Commission voted to refer this matter to the ADR Office on June 14, 2016.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred Americans For A Conservative Direction (Respondent) for failing to timely file the 2014 July Quarterly Report. On April 25, 2014, Respondent filed a 24-Hour Report disclosing two (2) independent expenditures totaling \$102,035, made in support of one (1) federal candidate, on Schedule 5-E (Itemized Independent Expenditures). A 2014 July Quarterly Report was not timely filed on July 15, 2014 to support the independent expenditures disclosed on its 24-Hour Report. On September 10, 2015, Respondent filed a 2014 July Quarterly Report disclosing the independent expenditures totaling \$102,035, which were previously reported on the 24-Hour Report dated April 25, 2014.

Respondent filed the 2014 July Quarterly Report on September 10, 2015, but filed no further response.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Americans For A Conservative Direction.
2. Approve the appropriate letters.
3. Close the file on this matter.