



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

February 7, 2017

TO: The Commission

THROUGH: Alec Palmer *[Signature]*
Staff Director

FROM: Patricia C. Orrock *[Signature]*
Chief Compliance Officer

Lynn M. Fraser *[Signature]*
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.

Recommendation to Approve
Settlement Agreement
ADR 804 (RR 15L-38)
Page 1

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.