



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

January 9, 2017

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 812 Foundation for a Greater America, Inc. and Anastasia Ault, Treasurer, Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: In accordance with the request to terminate its political committee status, Respondents will certify the closure of the Committee's federal account and file a termination report within one hundred eighty (180) days of the effective date of this agreement, and work with Commission staff to terminate their political committee status and reporting obligations with the Commission. The Committee will continue reporting until such time as the termination has been approved; and (b) pay a civil penalty of \$3,750.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 812 (RAD 16L-15). The ADR Office received this referral on September 9, 2016.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred the Foundation for a Greater America, Inc. and Anastasia Ault, Treasurer for failing to disclose all financial transactions on its 2014 30 Day Post-General Report. Respondents filed an Amended 2014 30 Day Post-General Report that disclosed additional disbursements totaling \$182,280.96.

Respondents contend that they are a small, grassroots organization with no permanent staff, no office, and no experience with campaign finance or its required reporting obligations. When the Committee realized there were errors and some failures to file reports, the Treasurer was replaced with a professional firm with extensive experience filing reports with the Commission. The new vendor did a comprehensive review of all reports filed, and filed a complete set of amendments to ensure the record was accurate. The Committee wishes to terminate its reporting obligations with the Commission.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of the Foundation for a Greater America, Inc. and Anastasia Ault, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.