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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

September 26, 2018

TO: The Commission

THROUGH: Alec Palmer
Staff Director

FROM: Patricia C. Orrock PCO
Chief Compliance Officer

Krista J. Roche KJR
Director, ADR Office

SUBJECT: ADR 816 R Klepinger for Congress and Robert Klepinger, Treasurer, Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Participate in a one-on-one training regarding basic reporting requirements and procedures scheduled with the Information Division and/or Reports Analysis Division (RAD); and file and/or amend reports disclosing all campaign activity for the 2014 and 2016 election cycles and respond to any outstanding inquiries from the Commission.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 816 (MUR 7036). The ADR Office received this referral which was transferred from the Office of General Counsel on November 15, 2016.

SUMMARY: The Citizens for Turner filed this Complaint alleging violations of the FECA by R Klepinger for Congress and Robert P. Klepinger, Treasurer (Respondents or the Committee). The Complaint alleges that Respondents failed to include disclaimers on fund raising materials, used public disclosure statements for soliciting contributions, failed to disclose receipts and/or disbursements through filing reports with the Commission, and failed to respond to an inquiry from the Commission as required.

Respondents contend that Mr. Klepinger ran the 2014 and 2016 campaigns on his own and did not realize that he exceeded the $5,000 limit until the Complaint was

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filed. Respondents also contend that an adequate disclaimer was added to communications in response to the Complaint. In addition, the Committee asserts that it was not aware it could not use the public disclosure of those who donated to his opponent to solicit contributions and did not receive any contributions as a result of the impermissible solicitations.

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RECOMMENDATIONS:

1. Approve the attached negotiated settlement of R Klepinger for Congress and Robert Klepinger, Treasurer.

2. Approve the appropriate letters.

3. Close the file on this matter.