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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

SENSITIVE

**MEMORANDUM**

March 13, 2018

TO: The Commission

THROUGH: Alec Palmer *PCO*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 848 Right to Rise USA and Charles Spies, Treasurer,  
Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Certify that a representative of the Committee participates  
in an FEC conference, webinar, or other program  
developed in consultation with the FEC's Information  
Division; and pay a civil penalty of \$2,100.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 848 (RR 16L-21). The Commission voted to transfer this matter from the Office of General Counsel to the ADR Office on October 24, 2017.

**SUMMARY:** The Reports Analysis Division (RAD) referred Respondents for failure to timely file one (1) 48-Hour Report totaling \$41,745.17 to support fifty (50) independent expenditures disclosed on the 2015 Year-End Report.

The Committee contends this was an inadvertent omission. The Committee further indicates that the amount at issue represents a very small portion of its activity, totaling only 0.05% of the \$86,817,478.31 it spent on independent expenditures during the 2016 election cycle.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Right to Rise USA and Charles Spies, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.