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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

**MEMORANDUM**

March 16, 2018

TO: The Commission

THROUGH: Alec Palmer *PCO for AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 850 The Loose Group and E. John Whelchel,  
Treasurer, Recommendation to Approve Negotiated  
Settlement

RESOLUTION TERMS: Certify that a representative of the Committee participated  
in an FEC conference, webinar, or other program  
developed in consultation with the FEC's Information  
Division; and pay a civil penalty of \$3,800.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 850 (RAD 17L-41). The ADR Office received this referral on October 27, 2017.

**SUMMARY:** RAD referred Respondents for failing to disclose all financial activity on the 2016 12 Day Pre-General Report. The Committee filed an amended report on May 16, 2017, disclosing additional disbursements totaling \$83,000.

In Miscellaneous Electronic Submissions (FEC Form 99) filed on August 10, 2017, the Committee stated that the omission was due to an administrative error at the office of the preparer. The Committee indicates it replaced the preparer.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of The Loose Group and JohnE. Whelchel, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.