FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

March 28, 2018

TO: The Commission

THROUGH: Alec Palmer *PCO for AP*
                              Staff Director

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

                              Krista J. Roche *KQR*
                              Director, ADR Office

SUBJECT: ADR 854 Make America Great Again and Leslie Caldwell, Treasurer, Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Amend relevant 2015-2016 reports to address any inadequate responses and nonresponses to requests for additional information from RAD; and pay a civil penalty of $3,375.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 854 (AD A17-14). The ADR Office received this referral on November 8, 2017.

> **SUMMARY:** The Reports Analysis Division referred and the Audit Division transferred Respondents for a series of reporting errors and other FECA violations during the 2015-2016 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's reporting errors included, among other items: failure to file reports and late filing, mathematical discrepancies, failure to properly itemize contributions from individuals, and failure to properly itemize disbursements.
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> Respondents contend that there were reporting challenges during the 2016 election cycle. Specifically, the Committee has revised internal procedures regarding report preparation, sought advice from legal counsel regarding compliance, and met with RAD to discuss amending 2016 reports to clarify the public record.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Make America Great Again and Leslie Caldwell, Treasurer.

2. Approve the appropriate letters.

3. Close the file on this matter.