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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

August 21, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 864 Nevada Republican Central Committee and Michael J. Bertrand, Treasurer, Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Participate in a one-on-one training regarding reporting requirements and procedures scheduled with the Information Division and/or Reports Analysis Division (RAD); and pay a civil penalty of \$5,000.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 864 (A17-16). The ADR Office received this referral on January 24, 2018.

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: mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize contributions from individuals, Federal Election Activity/Levin Funds, and allocated federal and non-federal activity.

Respondents contend that there were reporting challenges during the 2016 election cycle, and that the Committee is dedicated to enhancing its compliance efforts to ensure accurate reporting in the future.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Nevada Republican Central Committee and Michael Bertrand, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.