



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

June 26, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 870 Eugene Ludwig
Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Consult with campaign finance specialist to ascertain legal obligations prior to making any future independent expenditure or electioneering communication; and pay a civil penalty of \$3,700.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 870 (RAD 18L-18). The ADR Office received this referral on April 11, 2018.

SUMMARY: RAD referred Eugene Ludwig (Respondent) for failing to file one (1) 24-Hour Report totaling \$49,462.21 to support two (2) independent expenditures disclosed on the 2016 Year-End Report.

The Respondent filed a 24-Hour report covering these expenditures on September 7, 2017.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Eugene Ludwig.
2. Approve the appropriate letters.
3. Close the file on this matter.