



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

2018 NOV 28 PM 12:00

SENSITIVE

MEMORANDUM

November 28, 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

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: ADR 878 Perdue for Senate and Bradley Crate, Treasurer,
Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Perform required corrective action in accordance with the
Corrective Action Plan (Exhibit A of the Negotiated
Settlement); complete training in accordance with the
Training Plan (Exhibit B of the Negotiated Settlement); and
pay a civil penalty of \$30,000.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 878 (AR-2-745). The ADR Office opened this matter on July 12, 2018.

SUMMARY: Audit fieldwork of the Committee's 2013-2014 election cycle activity showed that Respondents received prohibited contributions totaling \$117,265, received excessive contributions from individuals and political committees in the amounts of \$245,170 and \$80,500, respectively, received excessive contributions totaling \$271,193 that were untimely resolved or may still be resolved via a presumptive letter, and failed to disclose debts and obligations in the amount of \$128,972.

Respondents presented legal arguments and provided documentation in response to the apparent prohibited and excessive contributions received by the committee,

Recommendation to Approve
Negotiated Settlement
ADR 878 (AR-2-745)
Page 1

which reduced the amount of apparent excessive contributions. With regard to debts, the Audit Division confirms that disclosure reports were amended to disclose debts until they were extinguished.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Perdue for Senate and Bradley Crate, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.