



FEDERAL ELECTION COMMISSION  
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**SENSITIVE**

**MEMORANDUM**

April 24, 2019

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 891 Scholten4Iowa Campaign Committee and Scott M. Hubay, 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;

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 891 (MUR 7393). The ADR Office received this referral from the Office of General Counsel on November 8, 2018.

**SUMMARY:** On May 31, 2018, Lori Adams filed a Complaint alleging that Scholten4Iowa Campaign Committee and Scott M. Hubay, Treasurer (Respondents or the Committee) failed to include a disclaimer on a mass mailing distributed to the public. The Complaint states that the mailer "does not include the required disclaimer and gives the recipient no information regarding what entity disseminated the piece."

The Committee acknowledges that a disclaimer should have been included on the mailing, which cost \$9,970. Respondents contend that since this time, they have retained a treasurer experienced in federal campaigns, a new campaign manager familiar with disclaimer requirements, and a more experienced direct mail vendor.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Scholten4Iowa Campaign Committee and Scott M. Hubay, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.