



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 7, 2019

Paul Kilgore, Treasurer  
SEAL PAC Supporting Electing American Leaders PAC  
824 S Milledge Ave, Ste 101  
Athens, GA 30605

Re: ADR 893 (RR 18L-26)  
SEAL PAC Supporting Electing American Leaders PAC and Paul Kilgore, Treasurer

Dear Paul Kilgore:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Office of General Counsel was based on a review of reports filed by SEAL PAC Supporting Electing American Leaders PAC which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with SEAL PAC Supporting Electing American Leaders PAC and Paul Kilgore, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

**Summary of Case:** RAD referred Respondents for failing to disclose all financial activity on its 2017 Mid-Year Report, originally filed on July 30, 2017. On January 31, 2018, the Committed filed an Amended 2017 Mid-Year Report including \$607,776.02 in additional receipts from the original report.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on May 6, 2018 indicating that the Committee was researching alternative software vendors and while rebuilding their data file discovered that additional receipts were not included. Additionally, the Committee contends that as the bulk of the missing data was from individual contributions under \$200 (in aggregate), the individual contributor information was not required to be itemized. However, with the new software, the PAC is enabled to fully report most of its contributors' respective information.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days from the date of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 893**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,

Rosa Marshall  
Assistant Director  
Alternative Dispute Resolution Office

Enclosures:

Commitment to Participate in ADR & Designation of Representative/Counsel