



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

**MEMORANDUM**

April 30, 2019

**TO:** The Commission

**THROUGH:** Alec Palmer  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

**SUBJECT:** ADR 893 SEAL PAC Supporting Electing American  
Leaders PAC and Paul Kilgore, 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 Negotiated Settlement pertaining to ADR 893 (RR 18L-26). The ADR Office received this referral from the Office of General Counsel on November 16, 2018.

**SUMMARY:** The Reports Analysis Division (RAD) referred SEAL PAC Supporting Electing American Leaders PAC and Paul Kilgore, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2017 Mid-Year Report, filed on July 30, 2017. On January 31, 2018, the Committee filed an Amended 2017 Mid-Year Report including \$607,776.02 in additional receipts.

The Committee filed a Form 99 (Miscellaneous Electronic Submission) on May 6, 2018 indicating that during the process of rebuilding a corrupt data file "it was discovered that additional receipts were not included" on the original report. In that Form 99, the Committee also states that it transitioned to "advanced commercial software that is more capable of handling the volume of receipts received by the

Recommendation to Approve  
Negotiated Settlement  
ADR 893 (RR 18L-26)  
Page 2

PAC" and that it "increased its filing schedule from quarterly to monthly" in order to ensure accurate disclosure going forward.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of SEAL PAC Supporting Electing American Leaders PAC and Paul Kilgore, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.