



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

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.