



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

April 23, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by MAH*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 894 American Future Fund  
Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Retain counsel to review compliance procedures and provide a memorandum prepared by counsel detailing the applicable reporting requirements to those responsible for preparing and filing reports; and pay a civil penalty of \$15,600.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 894 (RR 18L-09). The ADR Office received this referral on December 6, 2018, in accordance with a vote by the Commission.

**SUMMARY:** The Reports Analysis Division (RAD) referred American Future Fund (Respondent) for failing to timely file the 2016 Year-End Report to support independent expenditures totaling \$912,250.00 disclosed on one (1) 48-Hour Report and one (1) 24-Hour Report. Both the 48-Hour Report and 24-Hour Report were timely filed.

In a response filed by counsel, Respondent acknowledges that the report was not timely filed because of an administrative oversight. Respondent contends that once they were made aware of the oversight, the report at issue was filed.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of American Future Fund.
2. Approve the appropriate letters.
3. Close the file on this matter.