



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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2019 APR 30 PM 3: 56

MEMORANDUM

April 30, 2019

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Rosa Marshall *RM*
Assistant Director, ADR Office

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 896 Americas PAC and Tom Donelson, Treasurer,
Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Certify that a representative of the Committee participated
in an educational program developed in consultation with the
FEC's Reports Analysis Division and Information Division;

Attached for your review is a signed Negotiated Settlement pertaining to ADR 896 (RAD 18L-34). The ADR Office received this referral on December 14, 2018.

SUMMARY: The Reports Analysis Division (RAD) referred Americas PAC and Tom Donelson, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$29,960.00 to support two (2) independent expenditures disclosed on the 2018 July Quarterly Report.

The Committee contends that the late submission was an administrative error and that they immediately filed the necessary 48-Hour Report once they received the Request for Additional Information from RAD on August 26, 2018. The Committee filed one (1) 48-Hour Report to support two (2) independent expenditures totaling \$29,960.00 on August 27, 2018.

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RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Americas PAC and Tom Donelson, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.