



RECEIVED
FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2019 JUN 20 PM 2:27

SENSITIVE

MEMORANDUM

June 20, 2019

TO: The Commission

THROUGH: Alec Palmer *AD by MAH*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 897 Marsha for Senate and Ron Gant, 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; and
pay a civil penalty of \$7,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 897 (AD 17-02). The ADR Office received this referral on February 11, 2019.

SUMMARY: The Audit Division referred Marsha for Senate (f/k/a Marsha Blackburn for Congress, Inc.) and Ron M. Gant, Treasurer, ("Respondents" or the "Committee") for one finding detailed in the Final Audit Report of the Commission, as approved on February 1, 2019. The finding states that the Committee received contributions from individuals that exceeded the limit totaling \$100,350 during the 2015-2016 election cycle.

The Committee resolved all excessive contributions in response to the audit, albeit untimely. Respondents provided the Audit Division with copies of presumptive letters totaling \$82,550; copies of signed reattribution letters totaling \$6,900, and copies of refund checks totaling \$10,900.

In response to the Interim Audit Report, the Committee explained that it believed it had previously received timely authorizations from the contributors to

Recommendation to Approve
Negotiated Settlement
ADR 897 (AD 17-02)
Page 1

redesignate or reattribute the contributions. Furthermore, the Committee noted that the compliance staff from the 2015-2016 cycle had departed and the Committee "takes its compliance and reporting obligations very seriously."

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Marsha for Senate and Ron Gant, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.