



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

**MEMORANDUM**

July 1, 2019

**TO:** The Commission

**THROUGH:** Alec Palmer  
Staff Director *AP*

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

Krista J. Roche *KJR*  
Director, ADR Office

**SUBJECT:** ADR 898 Maryott for Congress and Brian Maryott,  
Treasurer, Recommendation to Approve Negotiated  
Settlement

**RESOLUTION TERMS:** Develop and certify implementation of a policy whereby  
reports are reviewed by multiple individuals prior to filing  
and bank reconciliations are performed by an outside  
consultant on a quarterly basis; 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  
\$5,500.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 898 (RAD 19L-01). The ADR Office received this referral on February 12, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred Respondents for failing to disclose all financial activity on its 2018 12 Day Pre-Primary Report, filed on May 26, 2018. On July 10, 2018, the Committee filed an Amended 2018 12 Day Pre-Primary Report including \$154,134.00 in additional disbursements.

Respondents indicate that this was an inadvertent omission which occurred largely because payments made via wire transfer were accidentally overlooked when the original report was filed. Respondents contend that the candidate was unaware of the omission on the original report, and supported efforts to clarify the public record

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as soon as he became aware of the issue. The Committee filed a Form 99 (Miscellaneous Electronic Submission) on November 5, 2018 indicating that the Amended 2018 12 Day Pre-Primary Report had been filed.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Maryott for Congress and Brian Maryott, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.