



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

June 28, 2019

TO: The Commission

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

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

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: ADR 901 and 903 Principles First, Inc. and Randall Pullen,  
Treasurer, Recommendation to Approve Negotiated  
Settlement

RESOLUTION TERMS: Pay a civil penalty of \$4,900 and work with Commission  
staff to terminate political committee status and reporting  
obligations.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 901 (MUR 7474) and ADR 903 (19L-02). The ADR Office received these matters on February 22, 2019 and March 4, 2019, respectively.

**SUMMARY:** The Reports Analysis Division (RAD) referred Principles First, Inc. and Randall Pullen, Treasurer (Respondents or the Committee) for failing to file one (1) 24-Hour Report totaling \$65,150 to support two (2) independent expenditures disclosed on the 2018 July Quarterly Report. In addition, on August 9, 2018, Campaign Legal Center filed a Complaint alleging that Respondents failed to timely file a 24-Hour Report for "at least \$49,350" in television ads that expressly advocated against the election of Matt Rosendale, a federal candidate who participated in Montana's June 5, 2018 election. Both the RAD referral and Complaint pertain to the same independent expenditures. Respondents verified that

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the independent expenditures related to this matter total \$65,150, and this amount includes both the production and ad costs paid to the vendor.

Respondents state that the late filing was an inadvertent mistake and that the Committee experienced electronic filing issues which prevented timely filing. Respondents also contend that there was no attempt to mislead the public or to not disclose the activity.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Principles First, Inc. and Randall Pullen, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.