



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

July 19, 2019

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 904 Legislative Majority PAC and Eleanor Collinson,
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;
perform an annual internal reconciliation for two years,
providing certification of same on the anniversary of the
effective date of this agreement each year; and pay a civil
penalty of \$9,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 904 (RAD 19L-03). The ADR Office received this referral on March 4, 2019.

SUMMARY: The Reports Analysis Division (RAD) referred Legislative Majority PAC and Eleanor Collinson, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2017 Mid-Year Report, filed July 31, 2017. Through a series of amendments,¹ the Committee disclosed \$363,767.47 in additional receipts and \$348,033.94 in additional disbursements.

The Committee filed a Form 99 (Miscellaneous Electronic Submission) on September 19, 2018 stating that it "hired a compliance firm to conduct a

¹ The Committee filed Amended 2017 Mid-Year Reports on September 11, 2017, January 31, 2018, April 19, 2018, May 18, 2018, and January 25, 2019.

comprehensive review of past filings” and “filed the necessary amendments to correct the public record.” The Committee later filed an additional Form 99 on January 25, 2019 further detailing the discrepancies uncovered during the comprehensive review. During negotiations, the Respondents emphasized that the review was voluntarily completed and that the Committee maintains a deep commitment to compliance. The Committee further stated that the newly hired compliance firm assisted with correcting the public record through amendments.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Legislative Majority PAC and Eleanor Collinson, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.