



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 27, 2019

Jon Berkon
Perkins Coie, LLP
700 Thirteenth St, NW
Suite 600
Washington, DC 20005

Re: ADR 904
Legislative Majority PAC and Eleanor Collinson, Treasurer

Dear Mr. Berkon:

Enclosed is a signed copy of the Negotiated Settlement resolving the referral initiated by the Federal Election Commission ("FEC/Commission") involving the above-shown Respondents. The Negotiated Settlement was approved by the Commission on **August 21, 2019** – the effective date of the agreement.

Note the specific timeframes for compliance detailed in paragraph 6 of the agreement. **Please forward to this office, a statement confirming Respondent's compliance with the terms listed in the aforementioned agreement.** The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 6, and contain the ADR case number. Correspondences may be emailed to this office at adr@fec.gov. For your convenience, a compliance chart is attached.

Under the terms of the agreement, a civil penalty in the amount of \$9,500 is due by September 20, 2019. Kindly review the attached payment instructions for details on payment methods and the collection of unpaid debts.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

FEDERAL ELECTION COMMISSION – ALTERNATIVE DISPUTE RESOLUTION OFFICE
1050 FIRST STREET, N.E., WASHINGTON, D.C. 20463
TELEPHONE: 202.694.1661
EMAIL: ADR@FEC.GOV



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Case Number: ADR 904
Source: RAD 19L-03
Case Name: Legislative Majority PAC

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Jonathan S. Berkon, Esq. representing Legislative Majority PAC and Eleanor Collinson, in the official capacity of Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Reports Analysis Division (RAD) referred Respondents 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.
4. Treasurers of political committees are required to report all financial activity, including all receipts and disbursements, pursuant to the FECA. 52 U.S.C. §§ 30104(a)(1), 30104(b)(2), 30104(b)(4), 11 C.F.R. §§ 104.1, 104.3(a), 104.3(b).
5. The Committee filed a Form 99 (Miscellaneous Electronic Submission) on September 19, 2018 stating that it "hired a compliance firm to conduct a comprehensive review of past filings" and "filed the necessary amendments to correct the public record."
6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) certify that a representative of the Committee participated in an FEC conference, webinar, or other

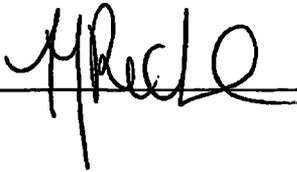
¹ The Committee filed Amended 2017 Mid-Year Reports on September 11, 2017, January 31, 2018, April 19, 2018, May 18, 2018, and January 25, 2019.

program developed in consultation with the FEC's Information Division within twelve (12) months of the effective date of this agreement; (b) 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 (c) pay a civil penalty of \$9,500 within thirty (30) days of the effective date of this agreement.

7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraph 6 above, and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 904 (RAD 19L-03), and resolves those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

Krista J. Roche, Director
Alternative Dispute Resolution Office



8/21/19
Date Signed

FOR THE RESPONDENTS:



Jonathan S. Berkon, Esq.
Representing Legislative Majority PAC
and Eleanor Collinson, Treasurer

7/15/19
Date Signed
