



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

August 21, 2019

Scott Pullins  
110 East Gambier Street  
Mount Vernon, OH 43050

Re: ADR 905  
Ohio Majority Trust and Scott Pullins, Treasurer

Dear Scott Pullins:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on August 19, 2019 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is attached.

Under the terms of the agreement, a civil penalty in the amount of \$1,750.00 is due in full on February 19, 2020. 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.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

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

Sincerely,

A handwritten signature in black ink, appearing to read "K. Roche", with a horizontal line extending to the right.

Krista J. Roche  
Director  
Alternative Dispute Resolution Office

Enc: Payment Instructions

cc: Gwendolyn Holmes, Finance and Accounting Office



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Case Number: ADR 905  
Source: RAD 19L-04  
Case Name: Ohio Majority Trust

### 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 Scott Pullins, Esq., representing Ohio Majority Trust and himself, 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:

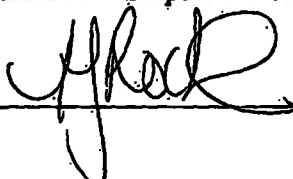
1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 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 the Committee for failing to file one (1) 48-Hour Report totaling \$35,000 for an independent expenditure disclosed on the 2017 Year-End Report.
4. A person, including a political committee, that makes or contracts to make independent expenditures aggregating \$10,000 or more at any time up to and including the 20th day before the date of an election shall file a report describing the expenditures within 48 hours. 52 U.S.C. § 30104(g)(2), 11 C.F.R. § 104.4(b)(2).
5. On October 24, 2018, the Committee filed one (1) 48-Hour Report to support one (1) independent expenditure of \$35,000. Respondents state that the initial failure to file the report was the result of inexperience with independent expenditure reporting requirements. Respondents note that they have since familiarized themselves on the requirements of the FECA in order to ensure the accurate reporting of independent expenditures in the future.
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 program developed in consultation with the FEC's Information Division regarding

independent expenditure reporting requirements within twelve (12) months of the effective date of this agreement; and (b) pay a civil penalty of \$1,750.00 payable in monthly installments beginning one (1) month after the effective date of this agreement, with five (5) monthly payments of \$300 and a final payment of \$250 due six (6) months after 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 905 (RAD 19L-04), 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.

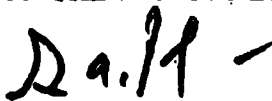
FOR THE COMMISSION:

Krista J. Roche, Director  
Alternative Dispute Resolution Office



8/10/19  
Date Signed

FOR THE RESPONDENTS:



Scott Pullins, Esq.  
Representing Ohio Majority Trust and  
Scott Pullins, Treasurer

7/2/19  
Date Signed