



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2019 SEP 23 AM 10: 58

**SENSITIVE**

**MEMORANDUM**

September 23, 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

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: ADR 917 Elevate Ohio (C00683037)  
Recommendation to Approve Negotiated Settlement

RESOLUTION TERMS: Certify that a representative participates in an FEC training program and pay a civil penalty of \$1,955.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 917 (RAD 19L-11). The ADR Office received this referral on June 3, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred Elevate Ohio and Jeffrey A. Ruppert, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2018 October Quarterly Report, filed on October 14, 2018. On October 25, 2018, the Committee filed an Amended 2018 October Quarterly Report including \$100,000.00 in additional disbursements.

On March 18, 2019, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that the increase was a result of “working from an incorrect set of data” when preparing the report. During negotiations, Respondents further stated that they have since consolidated their data into one software program and have implemented a checklist to ensure all information is disclosed on reports before filing.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Elevate Ohio and Jeffrey A. Ruppert, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.