



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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2019 OCT 31 PM 4:04

SENSITIVE

MEMORANDUM

October 31, 2019

TO: The Commission

THROUGH: Alec Palmer *AP b AK*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

Joshua A. Rebollozo *JAR*
ADR Specialist, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 927 — Michigan Republican Party and Carl Meyers,
Treasurer, (C00041160)

RESOLUTION TERMS: Certify that all Committee staff involved with creating, purchasing, or reporting independent expenditures participated in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division; and pay a civil penalty of \$37,500.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 927 (RAD 19L-24). The ADR Office received this referral on August 7, 2019.

SUMMARY: RAD referred Michigan Republican Party and Carl Meyers, Treasurer (Respondents or the Committee) for failing to file one (1) 24-Hour Report totaling \$499,950.00 to support one (1) independent expenditure disclosed on the 2018 30-Day Post-General Report.

Respondents stated that the failure to file the 24-Hour Report was a result of a lack of internal communication and a change in facts between the initial airtime purchase and the final decision for airtime usage. Respondents further stated that

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they have since established internal procedures to ensure that decisions pertaining to the usage of funds are made prior to the disbursement of funds.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Michigan Republican Party and Carl Meyers, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.