

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

2019 OCT 31 PM 4:04

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

October 31, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by AD*
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

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.