



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION  
SECRETARIAT

2019 DEC -5 PM 4: 01

**SENSITIVE**

**MEMORANDUM**

December 6, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by NHAH*  
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 930 — Conservative Triumph Fund and Ronald  
Ramirez, Treasurer (C00634717)

RESOLUTION TERMS: Develop and certify implementation of a compliance  
operations manual; 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; and pay a civil penalty of \$2,150.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 930 (RAD 19L-27). The ADR Office received this referral on August 22, 2019.

**SUMMARY:** The Reports Analysis Division (RAD) referred Conservative Triumph Fund and Ronald Ramirez, Treasurer, (Respondents or the Committee) for failing to file one (1) 24-Hour Report totaling \$28,495.41 to support five (5) independent expenditures disclosed on the Amended 2018 30-Day Post General Report.

The Committee states that the failure to file the 24-Hour Report was the result of a clerical error involving data entry. The Committee further states that they have

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since implemented procedures to improve the reporting of independent expenditures.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Conservative Triumph Fund and Ronald Ramirez, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.