



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

December 6, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by PHA*
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

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.