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**SENSITIVE**

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

June 10, 2020

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: Recommendation to Approve Negotiated Settlement
ADR 957 - Beto for Texas (C00501197) and
Gwendolyn L. Pulido, Treasurer

RESOLUTION TERMS: Pay a civil penalty of \$5,900 and work with Commission staff to terminate political committee status and reporting obligations.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 957 (RAD 20L-03). The ADR Office received this referral on January 24, 2020.

SUMMARY: The Reports Analysis Division (RAD) referred Beto for Texas and Gwendolyn L. Pulido, Treasurer (Respondents or the Committee) for failing to timely refund or redesignate 2018 General Election contributions in excess of the limits and prohibited contributions totaling \$79,051.35. All contributions have been refunded, albeit untimely.

The Committee filed amended reports and five (5) Form 99s (Miscellaneous Electronic Submissions) on November 5, 2018, May 7, 2019, June 3, 2019, October 15, 2019 and May 22, 2020 listing the corrective action taken to address the excessive and prohibited contributions received during the 2018 General Election. Respondents contend that the issue was caused by an

unprecedented number of contributions received during the election cycle and that all excessive and prohibited receipts were returned upon receiving Requests for Additional Information (RFAs) from RAD. In addition, Respondents stated that they intend to terminate the Committee's political committee status upon the closure of this matter and that they will work with Commission staff to ensure all reporting requirements are satisfied prior to termination.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Beto for Texas and Gwendolyn L. Pulido, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.