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**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

June 18, 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 960 - Tom Campbell for North Dakota (C00653675)  
and Tom Campbell, Treasurer

RESOLUTION TERMS: Pay a \$2,250 civil penalty 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 960 (RAD 19L-12). The ADR Office received this referral on January 31, 2020.

**SUMMARY:** The Reports Analysis Division (RAD) referred Tom Campbell for North Dakota and Tom Campbell, Treasurer (Respondents or the Committee) for failing to timely refund or redesignate 2018 General Election contributions totaling \$27,200 within the permissible timeframe after Tom Campbell (the Candidate) withdrew from the 2018 North Dakota Primary Election. All contributions have been refunded, albeit untimely.

Respondents state that refunds were issued and filed a Form 99 (Miscellaneous Text Submission) listing the twelve contributors' names and refunded amounts. Respondents state that they were unaware of the requirement to return these contributions, and refunds were issued upon notification from RAD. In

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addition, Respondents state that they intend to terminate the Committee's political committee status upon the closure of this matter, and they will work with Commission staff to ensure all reporting requirements are satisfied prior to termination.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Tom Campbell for North Dakota and Tom Campbell, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.