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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

December 23, 2020

TO: The Commission

THROUGH: Alec Palmer
Staff Director *AP*

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 974 - SEAL PAC Supporting Electing American
Leaders PAC and Paul Kilgore, Treasurer (C00570226)

RESOLUTION TERMS: Certify implementation of procedures to ensure that receipts
are timely reviewed for excessive contributions; and pay a
civil penalty of \$2,700.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 974 (RAD 20L-17). The ADR Office received this referral on August 19, 2020.

SUMMARY: The Reports Analysis Division (RAD) referred SEAL PAC Supporting Electing American Leaders PAC and Paul Kilgore, Treasurer (Respondents or the Committee) for failing to remedy excessive receipts totaling \$29,770 within the permissible timeframe during the 2019 calendar year. All contributions addressed in the referral have been remedied, albeit untimely.

The Committee filed amended reports and two (2) Form 99s (Miscellaneous Electronic Submissions) on October 23, 2019 and January 14, 2020 to address the excessive contributions received in 2019. Respondents contend that they have implemented procedures to ensure that the errors do not reoccur.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of SEAL PAC Supporting Electing American Leaders PAC and Paul Kilgore, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.