



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

May 4, 2021

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 982 - Wayne County Democratic Party

RESOLUTION TERMS: Complete training in accordance with the Training Plan
(Exhibit A of the Negotiated Settlement) and send a second
request for refund of the excessive contribution.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 982 (P-MUR 642). The Office of General Counsel (OGC) transferred P-MUR 642 to the ADR Office on October 30, 2020.

SUMMARY: On October 6, 2020, a *sua sponte* submission was filed by K. William Bailey, Chair of the Wayne County Democratic Party. Wayne County Democratic Party (the Respondent) is a local party organization in the state of Ohio and is not registered with the Federal Election Commission (the Commission or FEC). According to the submission, the Respondent made expenditures totaling \$15,356.56 in connection with a federal election. The expenditures include billboards and campaign materials such as yard signs, masks, hats and pins.

The Respondent states that the violations were not intentional, and they filed the *sua sponte* submission as soon as they were made aware of the issue. The Respondent also contends that the source of funds are comprised of small,

individual contributions, and therefore federally permissible. On December 29, 2020, the Respondent contacted the recipient committee of the excessive contribution and requested that either a refund be issued or funds be transferred to an account not used to influence federal elections.

RECOMMENDATIONS:

1. Approve the attached negotiated settlement of Wayne County Democratic Party.
2. Approve the appropriate letters.
3. Close the file on this matter.