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**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

March 19, 2021

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 Dismiss  
ADR 983 – Renewable Resource Hauling PAC - Marin Resource Recovery Center and Mardell Sarkela, Treasurer (C00557843) and Marin Sanitary Service d/b/a Marin Resource Recovery Center

The Office of General Counsel (OGC) transferred P-MUR 639 on October 30, 2020, and the ADR Office designated the matter as ADR 983. The ADR Office recommends the Commission exercise prosecutorial discretion and dismiss the matter. *Heckler v. Chaney* 470 U.S. 821 (1985). We include a summary and discussion of the matter for your review.

**SUMMARY AND ANALYSIS:** Renewable Resource Hauling PAC - Marin Resource Recovery Center and Mardell Sarkela, Treasurer (the Committee) and Marin Sanitary Service d/b/a Marin Resource Recovery Center (collectively, Respondents) filed a *sua sponte* submission dated September 10, 2020, indicating that the Committee received excessive and prohibited receipts from their connected organization totaling \$25,000. Three (3) contributions were made to the Committee, totaling \$15,000 during the 2015-2016 election cycle and \$10,000 during the 2019-2020 election cycle. All transactions were disclosed on reports filed with the Commission. On January 30, 2021, the Committee amended their 2020 October Quarterly Report to disclose a refund to their connected organization totaling \$5,032.66, reducing the overall excessive and prohibited receipts total to \$19,967.34.

According to the submission, the Committee refunded its balance of cash on hand as a corrective measure and it intends to terminate its political committee status upon resolution of this matter. On January 30, 2021, the Committee filed a Termination Report with the Commission.

The ADR Office recommends that the Commission exercise prosecutorial discretion and dismiss the matter which was voluntarily disclosed to the Commission by the Respondents. *Heckler v. Chaney* 470 U.S. 821 (1985).

### **RECOMMENDATIONS:**

1. Dismiss ADR 983 (P-MUR 639).
2. Approve the appropriate letters.

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<sup>1</sup> As outlined on page 9 of the Reports Analysis Division Review and Referral Procedures for the 2019-2020 Election Cycle, all Unauthorized Committees with receipts and disbursements plus debts less than \$50,000 during the election cycle, normally will not be reviewed. The Committee's receipts and disbursements total less than \$25,000 for the 2018 and 2020 election cycles.