



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA ELECTRONIC AND FIRST CLASS MAIL

Michael Bayes, Esq.
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JUN - 6 2018

RE: MUR 7365 (Let America Work)

Dear Mr. Bayes:

On May 30, 2018, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 52 U.S.C. § 30104(g)(1), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. See Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Roy Q. Lockett".

Roy Q. Lockett
Attorney

Enclosure
Conciliation Agreement

1 1. The Committee is an independent-expenditure-only political committee that
2 registered with the Commission on August 4, 2015. Benjamin Ottenhoff is the Committee's
3 treasurer of record.

4 2. The Federal Election Campaign Act of 1971, as amended, requires committee
5 treasurers to file reports of receipts and disbursements in accordance with the provisions of
6 52 U.S.C § 30104(b). 52 U.S.C. § 30104(a)(1). This requirement includes reporting
7 contributions received and independent expenditures made by political committees other than
8 authorized committees. 52 U.S.C. §§ 30104(b)(2)(A), (4)(H)(iii); 11 C.F.R. §§ 104.3(a)(2)(i),
9 (b)(1)(vii), 104.4(a).

10 3. Further, political committees that make independent expenditures aggregating
11 \$1,000 or more with respect to a given election after the 20th day, but more than 24 hours, before
12 the date of that election, must disclose them within 24 hours following the date of dissemination.
13 52 U.S.C. § 30104(g)(1); 11 C.F.R. § 104.4(c). In addition, political committees must file
14 additional reports within 24 hours after each time they make or contract to make independent
15 expenditures aggregating an additional \$1,000. 11 C.F.R. § 104.4(c).

16 4. On December 2, 2016, the Committee filed its Submission noting that it made one
17 independent expenditure in the amount of \$324,821 to Stick & Rudder Strategies, Inc. for media
18 services in opposition of Russell Feingold. Although the Committee disseminated this
19 independent expenditure on October 31, 2016, it failed to disclose it on a 24-Hour Report. On
20 November 30, 2016, the Committee filed a 24-Hour Report including this independent
21 expenditure. The Committee also disclosed the independent expenditure on its 30-Day Post-
22 General Report filed on December 8, 2016.

