

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

January 6, 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

Joshua A. Rebollozo *JAR*  
ADR Specialist, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 978 - Protect Freedom Political Action Committee and  
Paul Kilgore, Treasurer (C00657866)

RESOLUTION TERMS: Certify that a staff member participated in an FEC training  
and pay a civil penalty of \$2,125.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 978 (RAD 20L-20). The ADR Office received this referral on October 1, 2020.

**SUMMARY:** The Reports Analysis Division (RAD) referred Protect Freedom Political Action Committee and Paul Kilgore, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour report totaling \$42,500 supporting one (1) independent expenditure disclosed on the 2020 May Monthly Report.

Respondents state that the failure to file the 48-Hour Report was the result of a mistake and note that the 48-Hour Report was filed upon notification of the failure to file.

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**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of Protect Freedom Political Action Committee and Paul Kilgore, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.