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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

April 14, 2023

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 Approve Negotiated Settlement
ADR 1094 - Sagebrush Rebellion PAC and
Catharine Porter O'Neill, Treasurer (C00792358)

RESOLUTION TERMS: Certify that a representative of the Committee participated
in an FEC training and pay a civil penalty of \$6,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1094 (RAD 22L-26). The ADR Office received this referral from the Reports Analysis Division (RAD) on December 13, 2022.

SUMMARY: The Reports Analysis Division (RAD) referred Sagebrush Rebellion PAC and Catharine Porter O'Neill, Treasurer (Respondents or the Committee) for failing to timely file three (3) 24-Hour Reports, totaling \$79,824.15, to support six (6) independent expenditures disclosed on the 2022 July Quarterly Report. On October 6, 2022, the Committee filed three (3) 24-Hour Reports to support these independent expenditures, albeit untimely.

In an FEC Form 99 (Miscellaneous Electronic Submission) filed on October 6, 2022, the Committee stated that the failure to timely file 24-Hour Reports was the result of a disruption in Committee staffing and further stated the 24-Hour Reports were filed upon telephonic notification of the failure to file from RAD.

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Additionally, the Committee retained the services of a new treasurer and bookkeeper to assist with the filing of reports.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Sagebrush Rebellion PAC and Catharine Porter O'Neill, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.