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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

January 22, 2024

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 1134 - Great Lakes PAC and
Tim Kaltenbach, Treasurer (C00375584)

RESOLUTION TERMS: Certify the Committee amended relevant 2021-2022 reports after consultation with the FEC's Reports Analysis Division (RAD); develop and certify implementation of a process to track receipt of, and response to, communications with the Commission; certify that a representative of the Committee participated in an FEC training program; and pay a civil penalty of \$5,225.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1134 (RAD 23L-46). The ADR Office received this referral on September 12, 2023.

SUMMARY: RAD referred Great Lakes PAC and Tim Kaltenbach, Treasurer (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2021-2022 election cycle. The Committee's errors included, among other items: excessive, prohibited, and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize contributions from individuals, and failure to properly itemize contributions and transfers to political committees.

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During negotiations, Respondents contended that the Committee experienced reporting challenges during the 2021-2022 election cycle. Specifically, Respondents stated that the personnel responsible for its compliance was inexperienced. The Committee also expressed its willingness to develop a process to track communications from the Commission and attend training to enhance its ongoing compliance efforts.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of Great Lakes PAC and Tim Kaltenbach, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.