



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

July 9, 2012

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Lynn M. Fraser *LF*  
Director, ADR Office

BY: Krista J. Roche *KJR*  
Assistant Director, ADR Office

SUBJECT: ADR 619 The Common Sense Movement  
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Designate a compliance specialist; circulate a written policy and procedure document detailing the proper reporting of independent expenditures and disclaimer requirements; and pay a civil penalty of \$1,500.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 619 (P-MUR 536). The ADR Office received this referral on June 8, 2012.

**SUMMARY:** In this case, the Office of General Counsel referred Respondent for violations disclosed in a *sua sponte* submission dated May 9, 2012. In that submission Respondent disclosed the failure to timely file a 24-Hour Notice for an independent expenditure totaling \$29,760 for a television ad that aired from April 17-22, 2012. Respondent contends that on May 7, 2012, as soon as the oversight was uncovered, the proper FEC form was filed. According to the *sua sponte* submission, the television ad at issue also failed to include the statement "Common Sense Movement is responsible for the content of this advertising."

Recommendation to Approve  
Settlement Agreement  
ADR 619 (P-MUR 536)  
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**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of The Common Sense Movement.
2. Approve the appropriate letters.
3. Close the file on this matter.

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