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Federal Election Commission
Washington, DC 20463

MEMORANDUM

February 6, 2014

TO: The Commission

THROUGH: Alec Palmer
Staff Director

FROM: Patricia C. Orrock
Chief Compliance Officer

Lynn M. Fraser
Director, ADR Office

Krista J. Roche
Assistant Director, ADR Office

SUBJECT: ADR 693 Citizens United Political Victory Fund and Kevin Allen, Treasurer, Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RR 13L-31 to the Office of General Counsel who transferred the matter to the ADR Office on January 15, 2014, and the ADR Office designated the referral as ADR 693. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 693 on February 10, 2014. Please contact Krista Roche if you have any questions, comments or concerns before then.

Summary of Case: RAD referred Citizens United Political Victory Fund and Kevin Allen, Treasurer (Respondents or the Committee) for failure to disclose all financial activity. The Committee amended its 2010 30 Day Post-General, 2011 March Monthly, 2011 June Monthly, 2012 October Monthly, and 2012 12 Day Pre-General Reports to disclose additional receipts of $5,561.50 and additional disbursements of $127, 511.07, which were not disclosed on the original reports.

On January 31, 2011, the Committee amended their 2010 30 Day Post-General report, originally filed on December 2, 2010, to disclose $7,990.50 in additional disbursements. On April 20, 2011, the Committee amended their 2011 March Monthly Report, originally filed on March 18, 2011, to disclose $5,000 in

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previously undisclosed disbursements. On July 20, 2011, the Committee amended their 2011 June Monthly Report, originally filed on June 20, 2011, to disclose $5,561.50 in receipts omitted from the original report. On December 6, 2012, the Committee amended their 2012 October Monthly Report, originally filed on October 20, 2012, to disclose $91,473.79 in additional disbursements. On December 2, 2012, the Committee also amended their 2012 12 Day Pre-General Report, originally filed on October 25, 2012, to disclose $23,046.78 in disbursements not included on the original report.

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