



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

August 26, 2014

David Warrington, Esq.  
LECLAIR RYAN, PC  
2318 Mill Road  
Alexandria, VA 22314

Re: ADR 703 (RAD 13L-21)  
America's Liberty Political Action Committee and Elizabeth Newberry, Treasurer

Dear Mr. Warrington:

The Reports Analysis Division of the Federal Election Commission ("FEC" or "Commission") determined that matters arising from its recent review of reports filed by America's Liberty Political Action Committee warranted further examination for possible violation of the Federal Election Campaign Act of 1971, as amended.

After considering the circumstances of this matter, the Commission voted to dismiss the matter against America's Liberty Political Action Committee and Elizabeth Newberry, Treasurer (Respondents or the Committee). In its memorandum to the Commission, dated July 29, 2014, this office recommended:

**SUMMARY:**

This matter should be dismissed because it does not appear, upon review, that the advertisement constitutes express advocacy under 11 C.F.R. § 100.22(a) and 11 C.F.R. § 100.22(b). Accordingly, the disbursement for the advertisement was not required to be reported as an independent expenditure. 2 U.S.C. § 431(17). Because a 24-Hour Report was not required, Respondents would not be in violation for failing to timely file the 24-Hour Report to support this expenditure. On this basis, the ADR Office recommends this matter be dismissed.

Accordingly, the Commission closed its file in this matter on August 26, 2014.

The FEC is obligated by federal regulations to make a finding to terminate its proceedings public, as well as the basis therefore. 11 C.F.R. § 111.20(b). In addition, the Commission will also place on the record copies of the referral and reports prepared for the Commission by this office to assist in its consideration of this matter. In accordance with federal statute, copies of documents relative to this matter will be forwarded to the FEC's Public Information Office.

If you have any questions regarding this matter, please contact this office.

Sincerely,



Krista J. Roche, Assistant Director  
Alternative Dispute Resolution Office

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