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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

April 22, 2014

TO: The Commission

THROUGH: Alec Palmer *for PCO*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: ADR 714 American Principles in Action, Informational Memo on Assignment

The Office of General Counsel referred RR 14L-04 on April 10, 2014, and the ADR Office designated the referral as ADR 714. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 714 on April 25, 2014. Please contact Lynn Fraser if you have any questions or concerns before then.

Summary of Case: The Reports Analysis Division referred American Principles in Action (Respondent) for failing to file two (2) 48-Hour Reports totaling \$74,496.50 to support eight (8) independent expenditures disclosed on its 2012 October Quarterly Report. On October 11, 2012, Respondent filed its 2012 October Quarterly Report disclosing nine (9) independent expenditures totaling \$75,305 in opposition to one (1) federal candidate on the Schedule 5-E. Eight (8) of the independent expenditures required two (2) 48-Hour Reports.

In response to a Request for Additional Information sent to the Respondent on September 3, 2013, Respondent filed a Miscellaneous Document Submission ("Form 99") on January 13, 2014. In the Form 99, Respondent stated that it was unable to explain why the two 48-Hour Reports for eight (8) independent expenditures disclosed on the 2012 October Quarterly Report were not filed. Respondent states there had been staff turn-over, and records were in disarray.