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Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

May 28, 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

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

SUBJECT: ADR 719 United Food and Commercial Workers International  
Union Active Ballot Club and Anthony M. Perrone, Treasurer  
Informational Memo on Assignemnt

The Reports Analysis Division (RAD) referred RAD 14L-15 for processing on May 20, 2014, and the ADR Office designated the referral ADR 719. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 719 on June 2, 2014. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** RAD referred United Food and Commercial Workers International Union Active Ballot Club and Anthony M. Perrone, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on the 2012 12 Day Pre-General Report originally filed October 25, 2012. On December 3, 2012 and January 29, 2013, the Committee filed amended reports disclosing additional receipts totaling \$70,572.41.

In a Miscellaneous Electronic Submission ("Form 99") filed on July 12, 2013, the Committee stated that the omissions occurred because the receipts were inadvertently not posted to the internal accounting system used for filing FEC reports. The Committee contends the report was amended after the discrepancy was discovered during a routine bank reconciliation.