



FEDERAL ELECTION
COMMISSION
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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

May 28, 2014

TO: The Commission

THROUGH: Alec Palmer *for CO*
Staff Director

FROM: Patricia C. Orrock *for CO*
Chief Compliance Officer

Lynn M. Fraser *for CO*
Director, ADR Office

SUBJECT: ADR 720 American Iron and Steel Institute Political Action Committee and Thomas J. Gibson, Treasurer, Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 14L-16 for processing on, and the ADR Office designated the referral ADR 720. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 720 on May 30, 2014. Please contact Lynn Fraser if you have any questions or concerns before then.

Summary of Case: RAD referred the American Iron and Steel Institute Political Action Committee and Thomas J. Gibson, Treasurer (Respondents or the Committee) for receiving misdeposited funds totaling \$47,997.87 during the 2012 calendar year and \$21,793.17 during the 2013 calendar year. These funds were originally intended for the Committee's connected organization, the American Iron and Steel Institute, and were not remedied within the permissible timeframes. In total, the Committee did not timely refund or transfer-out misdeposits of \$69,791.04 during the 2011-2012 and 2013-2014 election cycles.

On October 24, 2013, the Committee filed a Miscellaneous Electronic Document (Form 99) in which Respondents contend, among other things, that the misdeposit of funds intended for the connected organization, the American Iron and Steel Institute (AISI), was inadvertent. The identified receipts were the result of errors by an online credit card payment processor engaged by AISI to handle credit card

payments. At no point were any of the misdeposited funds used as contributions to a candidate for federal election, nor were any of these funds directed to another federal PAC.