

FEDERAL ELECTION COMMISSION SECRETARIAT

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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

October 8, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

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

SUBJECT: ADR 737 Pure Political Action Committee and Mary Doster,
Treasurer, Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 14L-35 in a memo dated September 29, 2014, and the ADR Office designated the referral ADR 737. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 737 on October 9, 2014. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred Pure Political Action Committee and Mary Doster, Treasurer, (Respondents or the Committee) for failing to timely file three (3) 48-Hour Reports totaling \$28,461.72 to support three (3) independent expenditures disclosed on the 2013 Year-End Report.

In a Miscellaneous Electronic Submission (Form 99) filed on May 27, 2014, the Committee explained that the \$28,461.72 represented production costs for three television spots. While the Committee filed the required 48-Hour Reports for dissemination costs related to the television spots, it did not view production costs as expenditures that directly resulted in public communications, and therefore did not file 48-Hour Reports.