



Federal Election Commission  
Washington, DC 20463

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**SENSITIVE**

**MEMORANDUM**

February 3, 2015

TO: The Commission

THROUGH: Alec Palmer *AP*  
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 737 Pure Political Action Committee and Mary Doster, Treasurer  
Recommendation to Dismiss

The Reports Analysis Division (RAD) referred RAD 14L-35, and the ADR Office designated the matter as ADR 737. The ADR Office recommends the Commission exercise prosecutorial discretion and dismiss the matter. *Heckler v. Chaney* 470 U.S. 821 (1985). We include a summary and discussion of the matter for your information.

**Summary and Analysis of Case:** The Reports Analysis division referred Respondents 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 as "media placement" costs. The Committee provided a sworn affidavit from its vendor indicating that these costs were for general consulting, not related to any public communication. On the basis that the costs were general consulting costs unrelated to any public communication, the ADR Office recommends dismissal as no 48-Hour Reports would have been required for such costs.

**RECOMMENDATION:**

- 1. Dismiss ADR 737 (RAD 14L-35) and close the file.**
- 2. Approve the appropriate letters.**