

FEDERAL ELECTION COMMISSION
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Federal Election Commission
Washington, DC 20463

CONFIDENTIAL

MEMORANDUM

November 5, 2014

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 741 CE Action Committee and Rita Copeland, Treasurer,
Informational Memo on Assignment

The Office of General Counsel (OGC) transferred RR 14L-23 for processing on October 30, 2014, and the ADR Office designated the referral ADR 741. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 741 on November 10, 2014. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: The Reports Analysis Division referred CE Action Committee and Rita Copeland, Treasurer (Respondents or the Committee) for failing to timely file four (4) 48-Hour Reports totaling \$62,865.81 to support fourteen (14) independent expenditures made in March and April 2013 which were disclosed on the Amended 2013 12 Day Pre-Special Report, received September 27, 2013. In addition, on June 19, 2013, the Committee amended its 2013 12-Day Pre-Special Report, originally filed on April 18, 2013, to disclose additional debts totaling \$124,842.93.

On September 27, 2013, the Committee filed a Miscellaneous Electronic Submission (Form 99) to explain the omissions. The Committee stated it had recently been formed at the time the original 2013 12 Day Pre-Special was filed.

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The Committee contends that it received invoices for debts and independent expenditures from its political consultants after the original report was filed. The Committee states that it now has a better system for tracking work performed by consultants to facilitate timely reporting of accrued expenses and 48-Hour Reports.