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Federal Election Commission
Washington, DC 20463

MEMORANDUM

March 16, 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

SUBJECT: ADR 750 Brotherhood of Railroad Signalmen Political Action Committee and Jerry C. Boles, Treasurer, Informational Memo on Assignment

The Office of General Counsel referred RR 15L-01 on March 16, 2015, and the ADR Office designated the referral as ADR 750. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 750 on March 19, 2015. Please contact Lynn Fraser if you have any questions or concerns before then.

Summary of Case: Reports Analysis Division (RAD) referred the Brotherhood of Railroad Signalmen Political Action Committee and Jerry C. Boles, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2010 May Monthly, 2010 June Monthly, 2010 July Monthly, 2010 30 Day Post-General, 2010 Year-End, 2011 February Monthly, 2011 March Monthly, 2011 April Monthly, 2011 May Monthly, 2011 June Monthly, 2011 July Monthly, 2011 October Monthly, 2012 February Monthly, 2012 March Monthly, 2012 May Monthly, 2012 June Monthly, 2012 July Monthly, 2012 August Monthly and 2012 October Monthly Reports to disclose additional receipts totaling \$76,504.89 and additional disbursements totaling \$30,569.95. The activity on these eighteen reports resulted in an aggregate increase in activity totaling \$107,074.84.

On February 28, 2013, the Committee filed a Miscellaneous Electronic Submission (Form 99), which stated, in part:

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"We are a railroad union and our members voluntarily may contribute to what we title the "Signalmen's Political League" (SPL), our internal name for the Political Action Committee. These deductions are made by their employers (Carriers) and deposited into our PAC account or a check is mailed to our office. With this, the carriers are to include a "deduction sheet" so that we will know who has given and in what amount on each deposit or check. On some occasions the Carrier does not provide the deduction sheet at the time of the payment and we are left to track it down. With this process, we are not always able to find this information in time for each monthly report. When we receive this information, an amendment is filed. We work diligently each time to provide accurate information at the time each report is due, and work regularly with each carrier to receive a complete deduction sheet from them, but, at times, we are unable to obtain that information in a timely fashion."