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Federal Election Commission
Washington, DC 20463

MEMORANDUM

June 28, 2017

TO: The Commission

THROUGH: Alec Palmer *SWH/fn*
Staff Director

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

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

SUBJECT: ADR 831 21st Century Democrats and Bill Combs, Treasurer
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 17L-18 for processing on June 26, 2017, and the ADR Office designated the referral ADR 831. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 831 on July 6, 2017. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred 21st Century Democrats and Bill Combs, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2016 30-Day Post-General Report, originally filed on December 8, 2016. On February 15, 2016, the Committee filed an Amended 2016 30-Day Post-General Report including \$118,367.13 in additional receipts.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on April 27, 2017, indicating that the Committee "reviewed its disclosure process and has completed an exhaustive internal audit of all data processed during FY2016." The Committee contends that the error was due to a vendor who did not properly upload itemized donor data and that the Committee amended reports once the data was uploaded. In addition, the Committee indicates that it "has taken major steps to adequately correct its disclosure process to be in compliance with the Commission's guidelines."

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