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Federal Election Commission
Washington, DC 20463

MEMORANDUM

August 21, 2017

TO: The Commission

THROUGH: Alec Palmer
Staff Director 

FROM: Patricia C. Orrock Patricia
Chief Compliance Officer C. Orrock

Digitally signed by
Patricia C. Orrock
Date: 2017.08.21
13:57:35 -0400

Krista J. Roche Krista Roche
Acting Director, ADR Office

Digitally signed by Krista Roche
Date: 2017.08.21 13:17:00 -0400

SUBJECT: ADR 837 Citizens United Super PAC LLC and Lauren Catts,
Treasurer, Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 17L-07 for processing on August 11, 2017, and the ADR Office designated the referral ADR 837. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 837 on August 25, 2017. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred 837 Citizens United Super PAC LLC and Lauren Catts, Treasurer (Respondents or the Committee) for two reporting issues. The Committee failed to dispose all financial activity on its 2016 April Quarterly Report, fining an amended report on April 29, 2016, which disclosed additional receipts totaling \$115,469.77. Additionally, the Committee failed to file two 48-Hour Reports totaling \$76,664.32 to support eighty-three (83) independent expenditures disclosed on the 2016 April Quarterly Report.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on September 22, 2016, stating that the increased activity on the 2016 April Quarterly Report was due to "clerical errors made during the data import process." The Committee also explained in the Form 99 that the missing 48-Hour Reports were caused by a direct vendor who "failed to follow established protocol requiring that firm to advise the committee in advance of each mailing of the date of the mailing and estimated cost of the mailing."

14-00000-001