



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

December 15, 2017

TO: The Commission

THROUGH: Alec Palmer *sent for*  
Staff Director

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

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

SUBJECT: ADR 858 Independence USA PAC and Howard Wolfson,  
Treasurer  
Informational Memo on Assignment

The Reports Analysis Division referred RAD 17L-47 for processing on December 11, 2017, and the ADR Office designated the referral ADR 858. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 858 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** RAD referred Independence USA PAC and Howard Wolfson, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2016 July Monthly Report, originally filed on July 20, 2016. On August 25, 2016, the Committee filed an Amended 2016 July Monthly Report including \$118,000 in additional in-kind contributions.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on April 21, 2017 indicating that "Per guidance from the Commission's Reports Analysis Division, the Committee amended its July 2016 monthly report to reflect in-kind receipts of polling results, \$78,000 of which was separately disclosed in a 48-hour independent expenditure report that was timely filed in August 2016 and \$40,000 of which related to an ad the Committee never aired."