



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
2018 FEB -8 AM 11:41

SENSITIVE

MEMORANDUM

February 8, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 865 Rights & Democracy Action and Peri Stockinger,
Treasurer
Informational Memo on Assignment

The Reports Analysis Division referred RAD 18L-07 for processing on February 5, 2018, and the ADR Office designated the referral ADR 865. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 865 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred Rights & Democracy Action and Peri Stockinger, Treasurer (Respondents or the Committee) for failing to file two (2) 24-Hour Reports totaling \$31,191.02 to support four (4) independent expenditures disclosed on the Amended 2016 30 Day Post-General Report.

The Committee contends that it attempted to file a report detailing independent expenditures using FEC Form 5, but the report was not accepted because registered political committees are required to file using FEC Form 3X. Additionally, the Committee contends there was internal confusion regarding the independent expenditure activity because the Committee was originally a 501(c)(4) organization. On October 25, 2017, the Committee filed a 24-Hour Report covering these expenditures.