



FEDERAL ELECTION COMMISSION
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SENSITIVE

MEMORANDUM

May 3, 2018

TO: The Commission

THROUGH: Alec Palmer *AWP*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 868 National Nurses United for Patient Protection and
Martha Kuhl, Treasurer
Informational Memo on Assignment

The Office of General Counsel referred RR 18L-08 for processing on April 6, 2018, and the ADR Office designated the referral ADR 868. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 868 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred National Nurses United for Patient Protection and Martha Kuhl, Treasurer (Respondents or the Committee) for failing to file four (4) 48-Hour Reports totaling \$28,049.00 to support five (5) independent expenditures and failing to file six (6) 24-Hour Reports totaling \$49,860.41 to support eight (8) independent expenditures disclosed on the 2016 July Quarterly Report.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on September 29, 2017, indicating that all independent expenditures that were unreported or untimely reported were done so inadvertently and without any intention to violate the FECA. The Committee contends that the vast majority of its independent expenditures for 2016 were timely and accurately reported.