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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

May 4, 2018

TO: The Commission

THROUGH: Alec Palmer *SWH/for*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 869 MoveOn.Org Political Action and Tom Matzzie,
Treasurer
Informational Memo on Assignment

The Office of General Counsel referred RR 17L-44 for processing on April 6, 2018, and the ADR Office designated the referral ADR 869. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 869 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred MoveOn.Org Political Action and Tom Matzzie, Treasurer (Respondents or the Committee) for forwarding deposited earmarked contributions totaling \$63,256.16 received for authorized committees more than ten (10) days after receipt on its Amended 2016 April Quarterly, Amended 2016 July Quarterly and 2016 30 Day Post-General Reports.

The Committee filed three (3) separate Miscellaneous Electronic Submissions (Form 99s) dated November 2, 2016, May 19, 2017, and June 23, 2017 contending that some earmarked contributions were transferred outside of the ten (10) day window because of a "software error" and "technical issues with its bundling tracking program." The Committee indicates that it "is developing procedures to ensure this does not happen in the future." In response to the referral, Respondents state that most of the contributions forwarded beyond the required time period were one or two days late, and none more than five days late.

Further, Respondents indicate that that this reflects only a small portion of the contributions bundled by Moveon.org in 2016.¹

The Committee states that in 2016, it bundled 105,013 federal contributions totaling \$1,400,400.74, and that the amount at issue reflects only 4.45% of the bundled contributions and 4.52% of the total amount of contributions bundled by the Committee in 2016.