



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

May 22, 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 873 Urban Victory Fund (UVF) and Drue Kinchen, Treasurer  
Informational Memo on Assignment

The Office of General Counsel transferred RR 17-14R for processing on May 15, 2018, and the ADR Office designated the referral ADR 873. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 873 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** The Commission approved the Audit Division to transfer this referral from the Reports Analysis Division to the Office of General Counsel. The Office of General Counsel subsequently transferred Urban Victory Fund (UVF) and Drue Kinchen, Treasurer, (Respondents or the Committee) to the ADR Office for a series of reporting errors and other FECA violations during the 2015-2016 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's reporting errors included, among other items the receipt of apparent excessive contributions totaling \$124,516 and failing to disclose \$30,000 in independent expenditures on Schedule E of the 2016 30 Day Post-General Report, which were previously disclosed on a 48-Hour Report.

Respondents contend that there were reporting challenges during the 2016 election cycle because they were unaware of reporting deadlines. Additionally, Respondents contend that they are an independent expenditure only committee and therefore, should not have excessive receipts.