



FEDERAL ELECTION COMMISSION
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MEMORANDUM

June 19, 2018

TO: The Commission

THROUGH: Alec Palmer *GW/H/for*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

SUBJECT: ADR 875 Joey Nations for Congress and Charlotte Nations,
Treasurer, Informational Memo on Assignment

The Office of General Counsel transferred MUR 7372 on June 7, 2018, and the ADR Office designated the referral ADR 875. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 875 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: On April 25, 2018, Leo Stratton filed a Complaint alleging that Joey Nations for Congress and Charlotte Nations, Treasurer (Respondents or the Committee) failed to include adequate disclaimers on its Facebook page and campaign website, as well as on physical campaign materials such as yard signs and bumper stickers. Further, the Complaint alleges that the donation pages on the Committee's website and Facebook page do not include a mechanism for collecting employer and occupation information, and do not include statements of law regarding the limitations and prohibitions. Lastly, the Complaint alleges that the Committee's Facebook page categorizes the Committee as a Non-Profit, but there is no documentation supporting that claim.

In a response dated May 17, 2018, Charlotte Nations indicates that the disclaimer box is not required on the logo, signs, or stickers because the Committee "was not soliciting donations" with those items. Further, Ms. Nations contends that the donation page "does not require a disclaimer as it is not a written solicitation." Additionally, Ms. Nations states that the official website for the Committee

includes the required disclaimers. Lastly, Ms. Nations indicates that the Committee "is not a nonprofit organization and Facebook is not a legal designation of such."