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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

August 23, 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 885 Sinema for Congress and Cynthia Leigh Applebaum,
Treasurer, Informational Memo on Assignment

The Office of General Counsel referred MUR 7389 for processing on August 15, 2018, and the ADR Office designated the referral ADR 885. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 885 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: On May 21, 2018, Matthew Anderson filed a Complaint alleging that Sinema for Arizona and Cynthia Leigh Applebaum, Treasurer (Respondents or the Committee) violated the Act's "best efforts" provisions requiring political committees to seek disclosure information in connection with any contributions received, specifically employer and occupation information. Additionally, the Complainant contends that the Respondents knowingly filed false reports to cover up its failure to seek such information.

In a response dated July 23, 2018, Counsel to the Respondents indicated that the Respondents "go above and beyond the Commission's regulations to comply with the 'best efforts' requirements." The response claims that the Respondents "proof all solicitation materials to ensure the materials clearly request the contributor's identifying information." The Respondents contend that within 30 days of receiving a contribution without complete donor information, they "contact the donor over email or by phone to request the missing information." If that is unsuccessful, the Respondents "mail a letter and pre-addressed envelope to obtain the information."

