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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

**MEMORANDUM**

November 20, 2018

TO: The Commission

THROUGH: Alec Palmer *AP by KJR*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 893 SEAL PAC Supporting Electing American Leaders PAC  
and Paul Kilgore, Treasurer, Informational Memo on Assignment

The Office of General Counsel referred RR 18L-26 for processing on November 16, 2018, and the ADR Office designated the referral ADR 893. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 893 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** RAD referred SEAL PAC Supporting Electing American Leaders PAC and Paul Kilgore, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2017 Mid-Year Report, filed on July 30, 2017. On January 31, 2018, the Committee filed an Amended 2017 Mid-Year Report including \$607,776.02 in additional receipts.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on May 6, 2018 indicating that the Committee was researching alternative software vendors and while rebuilding their data file "discovered that additional receipts were not included." Additionally, the Committee contends that "as the bulk of the missing data was from individual contributions under \$200 (in aggregate), the individual contributor information was not required to be itemized. However, with the new software, the PAC is enabled to fully report most of its contributors' respective information."