



FEDERAL ELECTION COMMISSION  
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**SENSITIVE**

**MEMORANDUM**

March 6, 2019

TO: The Commission

THROUGH: Alex Palmer  
Staff Director *AP*

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

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 901 & ADR 903 Principles First, Inc. and Randall Lee Pullen, Treasurer, Informational Memo on Assignment

The Office of General Counsel transferred MUR 7474 for processing on February 22, 2019, and the ADR Office designated the referral ADR 901. The Reports Analysis Division referred RAD 19L-02 for processing on March 4, 2019, and the ADR Office designated the referral ADR 903. We include a summary and discussion of these matters for your information. We expect initiating communication with Respondents within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** The Reports Analysis Division (RAD) referred Principles First, Inc. and Randall Lee Pullen, Treasurer (Respondents for the Committee) for failing to file one (1) 24-Hour Report totaling \$65,150.00 to support two (2) independent expenditures disclosed on the 2018 July Quarterly Report. On August 9, 2018, Campaign Legal center filed a Complaint alleging that Respondents failed to timely file an accurate 24-hour independent expenditure report for "at least \$49,350" in television ads that expressly advocated against the election of Matt Rosendale, a federal candidate who participated in Montana's June 5, 2018.

On July 7, 2018, the Committee filed a 24-Hour Report covering \$65,150 in independent expenditures. The Committee filed a Miscellaneous Electronic Submission (Form 99) on November 11, 2018 indicating that it had attempted to

timely file 24-hour reports but experienced "problems with entering transactions in the electronic filing software."

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