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FEDERAL ELECTION COMMISSION
 WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

August 11, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by 1/1/14*
 Staff Director

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

Krista J. Roche *KJR*
 Director, ADR Office

SUBJECT: ADR 924 Working Michigan (SuperPac) and Zinnia Kallabat,
 Treasurer, Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 19L-21 for processing on August 1, 2019, and the ADR Office designated the referral ADR 924. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 924 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred Working Michigan (SuperPac) and Zinnia Kallabat, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2018 October Quarterly Report, originally filed on October 14, 2018. On December 5, 2018, the Committee filed an Amended 2018 October Quarterly Report including \$59,193.41 in additional receipts and \$55,207.39 in additional disbursements.

In memo text attached to the Amended 2018 October Quarterly Report filed on May 7, 2019, the Committee stated that the failure to disclose all activity was inadvertent and was the result of a lack of communication. In addition, the Committee states that since this incident, they have implemented procedures with their vendors and field workers to receive information on a daily basis to ensure more accurate and timely filed reports.

Memo on Assignment
 ADR 924 (RAD 19L-21)