



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2019 SEP 13 PM 4:04

SENSITIVE

MEMORANDUM

September 13, 2019

TO: The Commission

THROUGH: Alec Palmer *AP by MATT*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: ADR 931 Patients for Affordable Drugs Action (C00680926) and
Benjamin L. Wakana, Treasurer
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 19L-29 for processing on September 6, 2019, and the ADR Office designated the referral ADR 931. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 931 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred Patients for Affordable Drugs Action and Benjamin L. Wakana, Treasurer (Respondents or the Committee) for failing to timely file three (3) 48-Hour Reports totaling \$138,860.97 to support five (5) independent expenditures disclosed on the 2018 October Quarterly Report. The Committee filed 48-Hour Reports disclosing the independent expenditures, albeit untimely.

On March 7, 2019, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that they have since adopted new procedures to prevent similar errors from happening in the future, which include estimating the costs for reporting independent expenditures at the time of dissemination to prevent late filing. In an additional Form 99 filed on May 7, 2019, the Committee stated that they have also

Memo on Assignment
ADR 931 (RAD 19L-29)

retained a new compliance software vendor and implemented a new tracking system for independent expenditures.