



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

MEMORANDUM

November 4, 2019

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Krista J. Roche *KJR*
Director, ADR Office

Joshua A. Rebollozo *JAR*
ADR Specialist, ADR Office

SUBJECT: Informational Memo on Assignment
ADR 947 — Build the Wave and Nathan Lerner, Treasurer,
(C00667667)

The Reports Analysis Division (RAD) referred RAD 19L-38 for processing on October 25, 2019, and the ADR Office designated the referral ADR 947. This office intends to notify Respondents after five business days. If you have any questions or concerns, please contact the ADR Office.

Summary of Case: RAD referred Build the Wave and Nathan Lerner, Treasurer (Respondents or the Committee) for failing to timely file one (1) 24-Hour Report totaling \$55,041.00 to support fifty-four (54) independent expenditures disclosed on the Amended 2018 30 Day Post-General Report.

In a Form 99 (Miscellaneous Electronic Submission) filed on July 23, 2019, the Committee stated that the failure to timely file the 24-Hour Report was a result of the Committee's team being "spread extremely thin" during the final days of the election. Further, the Committee noted a difficulty tracking expenditures due to the difficulty to predict expenses for ads or texts.