



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 948 — Human Rights Campaign Equality Votes and James  
M. Rinefierd, Treasurer, (C00508440)

The Reports Analysis Division (RAD) referred RAD 19L-39 for processing on October 25, 2019, and the ADR Office designated the referral ADR 948. 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 Human Rights Campaign Equality Votes and James M. Rinefierd, Treasurer (Respondents or the Committee) for failing to timely file two (2) 24-Hour Reports totaling \$31,350.00 to support six (6) independent expenditures disclosed on the Amended 2018 30 Day Post-General Report.

In a Form 99 (Miscellaneous Electronic Submission) filed on July 25, 2019, the Committee stated that the failure to file the reports was an administrative error. Further, the Committee stated that they have since implemented additional internal training and procedures to ensure all independent expenditures are timely filed in the future.

Memo on Assignment  
ADR 948 (RAD 19L-39)