



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

December 30, 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 954 — Americans for Police and Trooper Safety and Paul  
Kutac, Treasurer (C00656314)

The Reports Analysis Division (RAD) referred RAD 19L-44 for processing on December 12, 2019, and the ADR Office designated the referral ADR 954. 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 Americans for Police and Trooper Safety and Paul Kutac, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$60,000 to support four (4) independent expenditures disclosed on the 2019 July Quarterly Report.

In a Form 99 (Miscellaneous Electronic Submission) filed October 17, 2019, the Committee stated that it misinterpreted the regulation to require 48-Hour Reports only during election years. The Committee states that its misunderstanding has now been clarified and reports will be filed correctly moving forward.

Memo on Assignment  
ADR 954 (RAD 19L-44)