FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Unknown Respondents	)	MUR 6543

STATEMENT OF REASONS
Vice Chair CAROLINE C. HUNTER and
Commissioner MATTHEW S. PETERSEN

We concur with then-Vice Chairman McGahn's statement of reasons in this matter, which involved an allegation that certain robocalls failed to include legally required disclaimers. The calls at issue did not contain express advocacy under 11 C.F.R. § 100.22(a), and even assuming the calls contained express advocacy under 11 C.F.R. § 100.22(b), that section was likely unenforceable in the Fourth Circuit at the time the calls were made. And in any case, the calls likely cost a *de minimus* amount and, thus did not warrant an investigation into their legality.

CAROLINE C. HUNTER
Vice Chair

2/15/17
Date

MATTHEW S. PETERSEN
Commissioner

FEB. 15, 2017
Date