



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

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3 **MEMORANDUM**
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5 TO: The Commission
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7 FROM: Lisa J. Stevenson
8 Acting General Counsel
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10 BY: Charles Kitcher *CK*
11 Associate General Counsel for Enforcement
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13 Mark Allen *MA* by *CC*
14 Assistant General Counsel
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16 Cerissa Cafasso *CC*
17 Attorney
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19 SUBJECT: MUR 7355 (Unknown Respondent)
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21 RE: Notification of Respondent
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24 On October 4, 2019, the Commission found reason to believe that Unknown Respondent
25 violated 52 U.S.C. § 30120(a) and 11 C.F.R. § 110.11 by failing to include disclaimers on a
26 billboard expressly advocating a federal candidate's election, and 52 U.S.C § 30104(c) and
27 11 C.F.R. § 109.10 by failing to report an independent expenditure.¹ The Office of the General
28 Counsel began an investigation to identify Unknown Respondent.
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30 Based on our investigative findings to date, the Unknown Respondent is Ahern Ad, LLC.
31 The company leased a mobile solar generator ("MSG") that had an electronic billboard attached.
32 Ahern Ad itself developed and displayed advertisements on the MSG that read "Nevada / Dean
33 Heller / U.S. Senate" over a number of rotating backgrounds and which formed the basis of the
34 complaint in this matter.² As such, consistent with previous Commission practice in complaint-
35 generated matters involving initially unknown respondents, we intend to notify Ahern Ad, LLC,
36 about the allegations made in the Complaint and offer the company an opportunity to respond.³

¹ See Certification (Oct. 8, 2019), MUR 7355 (Unknown Respondent).

² See Compl., Ex. A.

³ See, e.g., MUR 6838 (Aossey); MUR 6642 (Kauffman).