



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

BY: Charles Kitcher *CK* by DC
Associate General Counsel for Enforcement

Claudio J. Pavia *CP*
Deputy Associate General Counsel for Enforcement

Roy Lockett *RQL*
Acting Assistant General Counsel

Don Campbell *DC*
Attorney

SUBJECT: MUR 7537 (Unknown Respondents)

RE: Notification of Respondent

On September 30, 2021, the Commission decided to merge MUR 7532 into MUR 7537 and found reason to believe that Unknown Respondents violated 52 U.S.C § 30120(a) by failing to include proper disclaimers on mailers and internet video ads concerning candidates Erik Paulsen and Ann Wagner on the basis that the communications contained express advocacy, and found reason to believe that Unknown Respondents violated 52 U.S.C § 30104(b) or (c), and (g) with regard to the mailers and internet video ads, on the basis that the communications contained express advocacy, by failing to report an independent expenditure. *See* Certification ¶ 8.a-b, d, MUR 7537 (Unknown Respondents) (Oct. 4, 2021). The Office of General Counsel began an investigation to identify the Unknown Respondents. *See id.* ¶ 8.g.

Based on our investigative findings to date, the Unknown Respondent is Care in Action, Inc., a 501(c)(4) tax-exempt corporation based in New York, NY. As such, consistent with previous Commission practice in complaint-generated matters involving initially unknown respondents, we intend to notify Care in Action, Inc., about the allegations made in the Complaints and offer it an opportunity to respond. *See, e.g.*, MURs 7355 (Heller for Senate, *et al.*); 6838 (Aossey); 6642 (Kauffman).