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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

June 27, 2013

TO: The Commission

THROUGH: Aleo Pelmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Lynn M. Fraser *LF*
Director, ADR Office

SUBJECT: ADR 644 Freedom and Liberty PAC and Michael D. Edmonds, Treasurer
Informational Memo on Assignment

The Office of General Counsel referred RR 13L-07 on June 25, 2013, and the ADR Office designated the referral as ADR 644. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 644 on July 2, 2013. Please contact Lynn Fraser if you have any questions, comments or concerns before then.

Summary of Case: The Office of General Counsel (OGC) referred the Freedom and Liberty PAC and Michael D. Edmonds, Treasurer (Respondents or the Committee) for failing to timely file two (2) 48-Hour Reports to support two (2) independent expenditures made up to and including the 20th day before the 2012 General Election. Respondents disclosed two (2) independent expenditures totaling \$80,000 on their 2012 September Monthly Report. The Committee filed two 48-Hour Reports on September 28, 2012 for an independent expenditure in the amount of \$35,000 made on August 6, 2012, and an independent expenditure in the amount of \$45,000 made on August 10, 2012.

Respondents acknowledge the inadvertent delinquency of the two 48-Hour Reports, but contend they are a small PAC with limited experience. Respondents further contend that the two 48-Hour Reports were filed as soon as the Committee became aware of the requirement, and before the Commission notified them.

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