



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Informed Catholic Citizens ) MUR 6137  
 )

**STATEMENT OF REASONS OF VICE CHAIR CAROLINE C. HUNTER AND  
COMMISSIONER MATTHEW S. PETERSEN**

This matter involves allegations that Informed Catholic Citizens ("ICC") paid for calls containing express advocacy without properly reporting the activity, among other allegations. The Commission voted unanimously to find reason to believe that ICC violated the Federal Election Campaign Act of 1971, as amended ("the Act"), and Commission regulations based on reporting and disclaimer violations. The Commission further authorized an investigation in this matter to determine the scope of the activity at issue. Based on the investigation, the Office of the General Counsel later recommended that the Commission close this matter under *Heckler v. Chaney*, 470 U.S. 821 (1985). While three of our colleagues voted to reject this recommendation and pursue a civil penalty, we agreed with OGC and the reasons set forth in its second report.<sup>1</sup>

2/15/17  
Date

Carole C. Hunter  
Caroline C. Hunter  
Vice Chair

FEB. 15, 2017  
Date

Matthew S. Petersen  
Matthew S. Petersen  
Commissioner

<sup>1</sup> We submit this statement of reasons to clarify the record. We note, however, that a statement likely is not necessary where we adopted the Office of General Council's recommendation to dismiss, even if other Commissioners disagree with that recommendation.

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