

**SENSITIVE**

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

January 11, 2022

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

Joshua A. Rebollozo *JAR*  
Assistant Director, ADR Office

SUBJECT: Informational Memo on Assignment  
ADR 1070 - Nancy Mace for Congress and Paul Kilgore,  
Treasurer (C00710103)

The Reports Analysis Division (RAD) referred RAD 22L-01 for processing on January 6, 2022, and the ADR Office designated the referral ADR 1070. This office intends to notify Respondents after five business days. If you have any questions or concerns, please contact the ADR Office.

**Summary of Case:** RAD referred Nancy Mace for Congress and Paul Kilgore, Treasurer (Respondents or the Committee) for failing to remedy excessive and prohibited 2020 Primary and General Election contributions totaling \$58,200 within the permissible timeframe. The Committee refunded these contributions outside the permissible timeframe.

In response to RAD, the Committee filed a Form 99 (Miscellaneous Electronic Submission) on September 6, 2019 and included additional memo text with its reports on September 21, 2020; December 7, 2020; and June 18, 2021 detailing its procedures for contributions that exceed a donor's contribution limit. In particular, the Committee states it attempts to reattribute excessive contributions, but if no response is received within 60 days, it processes a refund. Otherwise, the

Committee states it processes refunds for contributions from apparent business entities that cannot be verified as contributions from non-corporate funds.