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**SENSITIVE**FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463**MEMORANDUM**

November 22, 2023

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 1150 - Steve Daines for Montana and Lisa Lisker, Treasurer  
(C00491357)

The Audit Division referred AD A21-04 for processing on November 7, 2023, and the ADR Office designated the referral ADR 1150. 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:** The Audit Division referred Steve Daines for Montana and Lisa Lisker, Treasurer, (Respondents or the Committee) for one (1) finding detailed in the Final Audit Report of the Commission, as approved on November 1, 2023. The finding states that the Committee failed to disclose receipts, including contributions from individuals, political committees, conduit transfers, and joint fundraising activity, totaling \$945,418 during calendar years 2019 and 2020.

In response to the Draft Final Audit Report, the Committee filed amended reports for the 2020 election cycle, however, the amended reports did not materially correct the public record. In particular, the amended reports corrected most of the disclosure errors for the political committees, joint fundraising activity, and the

conduit transfers, however, nearly all of the identified errors for contributions from individuals remained inaccurately disclosed.<sup>1</sup>

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<sup>1</sup> The Final Audit Report of the Commission, as approved on November 1, 2023, states the Committee “corrected 97% of the disclosure errors for political committees, 99% of disclosure errors for the joint fundraising activity, and 85% of the disclosure errors for the conduit,” but “did not correct 97% of the disclosure errors for contributions from individuals, totaling \$549,204.”