



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

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**SENSITIVE**

**MEMORANDUM**

September 7, 2011

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Lynn M. Fraser *LMF*  
Director, ADR Office

SUBJECT: ADR 590 Marco Rubio for US Senate and Keith A. Davis, Treasurer  
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 11L-24 on August 30, 2011, and the ADR Office designated the referral as ADR 590. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 590 on September 12, 2011. Please contact Lynn Fraser if you have any questions, comments or concerns before then.

**Summary of Case:** RAD referred Marco Rubio for US Senate and Keith A. Davis, Treasurer (Respondents or the Committee) for receiving prohibited, excessive, and other impermissible contributions totaling \$210,173.09 for the 2010 Primary and General Elections. The Committee did not refund, reattribute, or redesignate these contributions within the appropriate timeframes.

Respondents contend that during the 2010 election cycle there were significant changes to the Committee's contribution processing systems. In February 2011, Respondents stated that they have reattributed, redesignated or refunded the required amounts for each impermissible contribution.

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