



Federal Election Commission
Washington, DC 20463

MEMORANDUM

March 13, 2012

TO: The Commission

THROUGH: Alec Palmer
Staff Director

FROM: Patricia Carmona
Chief Compliance Officer

Lynn M. Fraser
Director, ADR Office

BY: Krista J. Roche
Assistant Director, ADR Office

SUBJECT: ADR 609 John Kennedy for U.S. Senate, Inc., and Keith Davis, Treasurer
Informational Memo on Assignment

The Audit Division (Audit) referred A09-05 in a memo dated March 5, 2012, and the ADR Office designated the referral as ADR 609. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 609 on March 16, 2012. Please contact Lynn Fraser if you have any questions, comments or concerns before then.

Summary of Case: Audit referred John Kennedy for U.S. Senate, Inc., and Keith Davis, Treasurer (Respondents or the Committee) for a violation detailed in the Final Audit Report of the Commission approved on February 27, 2012. Specifically, an audit of the 2008 election cycle revealed that the Committee received excessive contributions totaling \$224,722. In response to the Interim Audit Report, Respondents provided copies of presumptive redesignation and/or reattribution letters, photocopies of negotiated refund checks, and a check to the U.S. Treasury. The Audit staff concluded that the Committee had materially resolved all excessive contributions, albeit in an untimely manner.

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