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**SENSITIVE**

**MEMORANDUM**

September 17, 2012

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Lynn M. Fraser *LMF*  
Director, ADR Office

BY: Krista J. Roche *KJR*  
Assistant Director, ADR Office

SUBJECT: ADR 623 National Council of Farmer Cooperatives CO-OP/PAC and  
Kelsey Swango, Treasurer, Informational Memo on Assignment

The Office of General Counsel (OGC) referred AR 12-06 on September 11, 2012, and the ADR Office designated the referral as ADR 623. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 623 on September 20, 2012. Please contact Krista Roche if you have any questions, comments or concerns before then.

**Summary of Case:** OGC the referred National Council of Farmer Cooperatives CO-OP/PAC and Kelsey Swango, Treasurer (Respondents or the Committee) based on a Final Audit Report approved by the Federal Election Commission on July 24, 2012. In that report the Commission found that during 2009 the Committee understated receipts and disbursements by \$10,770 and \$806, respectively, and overstated ending cash by \$6,500. The Commission found that in 2010 the Committee overstated beginning cash by \$13,901 and disbursements by \$6,500. In addition, the Commission found that the Committee failed to adequately disclose the occupation and name of employer for 57 percent of its itemized contributions.

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