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Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

June 18, 2013

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 639 Robert Waechter  
Informational Memo on Assignment

The Office of General Counsel (OGC) referred P-MUR 552 on June 4, 2013, and the ADR Office designated the referral as ADR 639. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 639 on June 21, 2013. Please contact Krista Roche if you have any questions, comments or concerns before that date.

**Summary of Case:** On December 31, 2012, and on January 30, 2013, the Sarasota County Sheriff's Office filed Complaints charging that Robert Waechter (Respondent) made contributions in the name of another totaling \$450. The Complaints were filed after a citizen filed a report with the sheriff's office and an investigation uncovered the activity in question. Respondent was arrested on December 14, 2012 on state charges of identity theft. The first Complaint provides that a \$200 contribution to Keith Fitzgerald for Congress that was made by the Respondent in the name of Lourdes Ramirez. The second Complaint provides that a contribution of \$250 was made by the Respondent, also in the name of Lourdes Ramirez, to Obama Victory Fund 2012.

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Through counsel Respondent asserts that the violation was *de minimis*, and that a S200 contribution is not subject to public disclosure under 2 U.S.C. §434(b)(3)(A) and 11 C.F.R. §104.8(a).

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