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**SENSITIVE**

**MEMORANDUM**

July 1, 2013

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Lynn M. Fraser *LF*  
Director, ADR Office

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

SUBJECT: ADR 645 AMERIPAC: The Fund for a Greater America and Amy L. Pritchard, Treasurer  
Informational Memo on Assignment

The Office of General Counsel referred RR 13L-15 on June 25, 2013, and the ADR Office designated the referral as ADR 645. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 645 on July 8, 2013. Please contact Krista Roche if you have any questions, comments or concerns before then.

**Summary of Case:** OGC referred AMERIPAC: The Fund for a Greater America and Amy L. Pritchard, Treasurer (Respondents or the Committee) for forwarding undeposited earmarked contributions received for authorized committees more than ten (10) days after receipt on its 2012 April Monthly Report. The earmarked contributions in question totaled \$35,000.

Respondents contend that the reports were corrected as soon as the error was discovered and that the error has not been repeated. Respondents indicate and the record reflects that all of the undeposited earmarked contributions were forwarded within the month received, and nine of the seventeen checks were forwarded only three to five days late. Respondents note that because the inadvertent delays were

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not extensive, all the recipient committees timely reported the contributions. Lastly, Respondents contend that the delays can be attributed to a newly-hired staff member who was unfamiliar with the ten day rule for forwarding undeposited earmarked contributions. Respondents indicate that internal procedures have been amended to ensure an error of this nature will not occur in the future.

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