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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

July 25, 2013

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LF/KR*
Director, ADR Office

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

SUBJECT: ADR 651 Montanans for Rehberg and Lorna Kuney, Treasurer
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 13L-27 in a memo dated July 23, 2013, and the ADR Office designated the referral as ADR 651. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 651 on July 30, 2013. Please contact Krista Roche if you have any questions, comments or concerns before then.

Summary of Case: RAD referred Montanans for Rehbert and Lorna Kuney, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2012 30 Day Post-General Report. The Committee amended the report on May 6, 2013 to disclose additional receipts totaling \$125,686.31.

The Committee contends that the omitted receipts included 2,637 contributions received on December 3, 2012. The Committee contends that it was impossible to record these contributions quickly enough to report them in a timely fashion, but that it amended the original report to ensure full disclosure.

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