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Federal Election Commission
Washington, DC 20463

MEMORANDUM

December 27, 2013

TO: The Commission

THROUGH: Alec Palmer *AP/ji*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

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

SUBJECT: ADR 651 Montanans for Rehberg and Lorna Kuney,
Treasurer, Recommendation to Approve Settlement
Agreement

RESOLUTION TERMS: Send a representative to an FEC seminar; perform an
internal audit and reconciliation; and pay a civil penalty of
\$3,250.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to
ADR 651 (RAD 13L-27). The ADR Office received this referral on July 23, 2013.

SUMMARY: The Reports Analysis Division referred Respondents for failing to
disclose all financial activity on their 2012 30 Day Post-General Report filed on
December 6, 2012. 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 from a direct mail fundraising vendor. The
Committee contends that it was impossible to record these contributions quickly

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enough to report them in a timely fashion, but that it amended the original report to ensure full disclosure.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Montanans for Rehberg and Lorna Kuney, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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