



Federal Election Commission  
Washington, DC 20463

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**SENSITIVE**

**MEMORANDUM**

September 19, 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 661 Rethink PAC and David N. Martin, Treasurer  
Informational Memo on Assignment

The Office of General Counsel transferred RR 13L-16 on September 17, 2013, and the ADR Office designated the referral as ADR 661. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 661 on September 24, 2013. Please contact Krista Roche if you have any questions, comments or concerns before then.

**Summary of Case:** The Office of General Counsel (OGC) transferred a matter involving Rethink PAC and David N. Martin, Treasurer (Respondents or the Committee), which was initially referred to OGC by the Reports Analysis Division. A review of reports indicated that the Committee failed to file one 24-Hour Report to support one independent expenditure totaling \$59,000.08. That expenditure was disclosed on November 26, 2012.

The Committee indicated in a Miscellaneous Electronic Submission (Form 99) that the omission was discovered during a routine review of disbursements conducted in preparation for filing the 2012 Post-General Report. The Committee contends that staff have reviewed procedures to ensure that future independent expenditures are reported in a timely manner.

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