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**SENSITIVE**

**MEMORANDUM**

October 21, 2013

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

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

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

SUBJECT: ADR 663 CF Industries, Inc. Good Government Fund and Renee Cardella,  
Treasurer  
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 13L-44 on September 27, 2013, and the ADR Office designated the referral as ADR 663. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 663 on October 24, 2013. Please contact Krista Roche if you have any questions, comments or concerns before then.

**Summary of Case:** RAD referred Industries, Inc. Good Government Fund and Renee Cardella, Treasurer (Respondents or the Committee) for failing to disclose all financial activity. On November 20, 2012 the Committee filed an Amended 2012 October Monthly Report disclosing additional disbursements of \$60,000.

In a Miscellaneous Electronic Submission (Form 99) the Committee explained that it experienced software problems wherein the application did not validate disbursements. The Committee contends that the source of the error was discovered, the relevant report was amended, and remedial measures have been taken to ensure errors of this nature do not occur in the future.

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