



Federal Election Commission  
Washington, DC 20463

2013 DEC 20 PH 2: 38  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

**SENSITIVE**

**MEMORANDUM**

December 20, 2013

TO: The Commission

THROUGH: Alec Palmer *APC*  
Staff Director

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

Lynn M. Fraser *LMF*  
Director, ADR Office

SUBJECT: ADR 672 Friends of Christine O'Donnell and Matthew J. Moran,  
Treasurer, Informational Memo on Assignment

The Office of General Counsel referred RR 13L-39 on December 9, 2013 and the ADR Office designated the referral as ADR 672. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 672 on December 27, 2013. Please contact Lynn Fraser if you have any questions, comments or concerns before then.

**Summary of Case:** The Reports Analysis Division (RAD) referred Friends of Christine O'Donnell and Matthew J. Moran, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2009 April Quarterly, 2010 April Quarterly, 2010 July Quarterly, 2010 October Quarterly, 2010 12 Day Pre-General, and 2010 20 Day Post-General Reports. On April 15, 2011, the Committee filed amended 2009 April Quarterly, 2010 April Quarterly, 2010 July Quarterly, 2010 October Quarterly, 2010 12 Day Pre-General, and 2010 20 Day Post-General Reports disclosing additional receipts of \$87,584.09 and additional disbursements of \$330,965.93.

Respondents contend they retained a professional compliance vendor when they realized there were errors and/or omissions in the Committee's financial data. A reconciliation of all financial data and the reports filed with the FEC resulted in these amended reports being filed to correct the record.