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Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

MEMORANDUM

December 31, 2013

TO: The Commission

THROUGH: Alec Palmer *awp*  
Staff Director

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

Lynn M. Fraser *LF*  
Director, ADR Office

SUBJECT: ADR 674 Friends of Jim Clyburn and James Bennett, Treasurer  
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 13L-53 on December 20, 2013, and the ADR Office designated the referral as ADR 674. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 674 on January 6, 2014. Please contact Lynn Fraser if you have any questions, comments or concerns before then.

**Summary of Case:** RAD referred the Friends of Jim Clyburn and James Bennett, Treasurer (Respondents or the Committee) for failing to disclose all financial transactions on their 2013 April Quarterly Report. The Committee filed its original 2013 April Quarterly Report on April 15, 2013. Respondents filed an Amended 2013 April Quarterly Report on July 15, 2013 that disclosed additional disbursements of \$100,775.

Respondents stated in a form 99 filed on September 13, 2013 that the omission occurred due to a miscommunication between the staff. In addition, the Committee had not received a current bank statement at the time the report was filed. Respondents stated that changes in financial procedures were made to ensure this does not reoccur.

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