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Federal Election Commission
Washington, DC 20463

MEMORANDUM

March 12, 2014

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TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

BY: Lynn M. Fraser *LMF*
Director, ADR Office

SUBJECT: Krista J. Roche *KJR*
Assistant Director, ADR Office

ADR 705 Rand Paul for US Senate 2010 and Kevin Broghamer,
Treasurer, Informational Memo on Assignment

The Office of General Counsel transferred RR 13L-46 for processing on March 10, 2014, and the ADR Office designated the referral ADR 705. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 705 on March 17, 2014. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: The Reports Analysis Division referred Rand Paul for US Senate 2010 and Kevin Broghamer, Treasurer, (Respondents or the Committee) for failing to disclose all financial activity. The Committee amended its 2009 Year-End, 2010 April Quarterly, 2010 12 Day Pre-Primary, 2010 July Quarterly, 2010 October Quarterly, 2010 12 Day Pre-General, and 2011 April Quarterly Reports to disclose additional receipts of \$266,577.04 and additional disbursements of \$90,695.87, which were not disclosed on original reports.

On March 1, 2013, the Committee filed a Miscellaneous Paper Submission ("Form 99") that stated the new treasurer instituted a full review of all financial activity, including a comprehensive analysis and reconciliations of records and reports, since the inception of the Committee. The Committee contends that,

based on this thorough review, amendments were prepared and filed promptly
with the FEC.

141-9002004072