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Federal Election Commission
Washington, DC 20463

MEMORANDUM

March 27, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *JW*
Director, ADR Office

SUBJECT: ADR 708 Marsh & McLennan Companies, Inc. PAC and Karen A. Farrell, Treasurer, Informational Memo on Assignment

The Office of General Counsel referred P-MUR 572 on March 24, 2014, and the ADR Office designated the referral as ADR 708. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 708 on March 31, 2014. Please contact Lynn Fraser if you have any questions or concerns before then.

Summary of Case: The Marsh & McLennan Companies, Inc. PAC and Karen A. Farrell, Treasurer (Respondents or the Committee) filed a *sua sponte* submission on March 6, 2014 stating that an employee of Marsh & McLennan Companies, Inc., Alex Moczarski, who is not currently a US citizen, permanent resident, or green card holder, made four (4) annual \$5,000 contributions (2010-2013) to the PAC, a separate segregated fund, in violation of the FECA. The Committee accepted those contributions, also in violation of the FECA. In response to an inquiry from the employee, it was determined that he was not eligible to make, nor the Committee to accept, contributions from an individual who is not currently a US citizen, permanent resident, or green card holder. Respondents issued a refund to the employee on February 14, 2014.

In addition, Respondents did a thorough review to determine whether any other eligibility issues existed with respect to employee contributions to the PAC, and to improve the solicitation and contribution process.