



Federal Election Commission
Washington, DC 20463

VIA FEDERAL EXPRESS

July 16, 2014

Keith Rockow

Re: ADR 713 (MUR 6797)

Dear Mr. Rockow:

On March 5, 2014, you filed a complaint with the Federal Election Commission (FEC/Commission) alleging certain violations of the Federal Election Campaign Act of 1971, as amended.

After considering the circumstances of this matter, the Commission determined to exercise its prosecutorial discretion and take no action against the Respondents, Linthicum for Congress (the Committee), Lisa A. Emard, Treasurer, and Dennis Linthicum (collectively, Respondents). In its memorandum to the Commission, dated May 1, 2014, this office stated:

Summary:

On March 5, 2014, Keith R. Rockow filed a complaint alleging that Linthicum for Congress (the Committee), Lisa A. Emard, Treasurer, and Dennis Linthicum (collectively, Respondents) violated the Federal Election Campaign Act of 1971, as amended (FECA). The complaint alleges that on October 15, 2013, the Committee received a transfer in the amount of \$6,500 from Friends for Dennis Linthicum, Mr. Linthicum's non-federal campaign, which was disclosed on the 2013 Year-End Report received on January 17, 2014.

On February 6, 2014, Treasurer Emard telephoned the Reports Analysis Division (RAD) to discuss this transaction and seek guidance. On February 10 and 11, 2014, the Committee amended the 2013 Year-End Report to reflect the \$6,500 as a loan from the candidate's personal funds. Respondents contend in their response to the complaint that this was the original intention of the candidate. Respondents provide evidence to support that \$6,000 of the amount in question was originally loaned to Friends for Linthicum by the candidate himself; the additional \$500 was due to the candidate from Friends for Linthicum as reimbursement for travel expenses.

