



Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

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**MEMORANDUM**

July 9, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Lynn M. Fraser *LMF*  
Director, ADR Office

SUBJECT: ADR 726 Joe Kyrillos for US Senate Inc. and Ronald Gravino,  
Treasurer, Informational Memo on Assignment

The Office of General Counsel referred RR 14L-03 on June 25, 2014, and the ADR Office designated the referral as ADR 726. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 726 on July 14, 2014. Please contact Lynn Fraser if you have any questions or concerns before then.

**Summary of Case:** The Reports Analysis Division (RAD) referred Joe Kyrillos for US Senate Inc. and Ronald Gravino, Treasurer (Respondents or the Committee) for accepting excessive contributions totaling \$138,950 from two (2) individuals, eight (8) partnerships, and one (1) federal political action committee (PAC) not qualified for multicandidate status during the 2012 election cycle. Of these excessive contributions, Respondents failed to remedy contributions totaling \$93,116.68 within the permissible timeframe. In addition, the Committee failed to remedy contributions totaling \$45,833.32

The Committee contends that the excessive contributions were accepted due to a misunderstanding of the FECA. Respondents refunded much of the excessive contributions, albeit untimely.