



**SENSITIVE**

# MEMORANDUM

October 28, 2014

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 726 (RR 14L-03)**. The ADR Office received this referral from the Office of General Counsel on June 30, 2014.

The Committee contends that the excessive contributions were accepted due to a misunderstanding of the FECA, specifically those provisions dealing with how to attribute a partnership contribution. Respondents further contend that they were able to refund all the excessive contributions, albeit untimely. The Committee requests to terminate its reporting obligations.

**Recommendation to Approve  
Settlement Agreement  
ADR 726 (RR 14L-03)  
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