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Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

August 19, 2014

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Lynn M. Fraser *LMS/LM*  
Director, ADR Office

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

SUBJECT: ADR 733 FaegreBD PAC and Frederick Garver, Treasurer,  
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 14L-28 for processing on August 6, 2014, and the ADR Office designated the referral ADR 733. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 733 on August 19, 2014. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** RAD referred FaegreBD PAC and Frederick Garver, Treasurer, (Respondents or the Committee) for failing to disclose all financial activity on the 2013 October Monthly Report, originally filed on October 18, 2013. On March 19, 2014, the Committee filed an Amended 2013 October Monthly Report disclosing additional receipts of \$125,000.

In a Miscellaneous Electronic Submission (Form 99) filed on May 27, 2014, the Respondents asserted that as a result of a recent merger of the Committee's supporting law firm, inexperienced staff handled the management of the accounting and FEC reporting. The Committee contended it discovered the omissions as a result of a routine year-end audit. The Committee contended that it has procedures requiring a monthly reconciliation of bank statements and

