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Federal Election Commission
Washington, DC 20463

MEMORANDUM

September 23, 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 736 New York State Conference of the International Union
of Operating Engineers Fed VPAF (NYS CONF IUOE FED
VPAF) and Theron H. Hogle, Treasurer, Informational Memo on
Assignment

The Office of General Counsel referred RR 14L-22 on August 25, 2014, and the ADR Office designated the referral as ADR 736. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 736 on September 26, 2014. Please contact Lynn Fraser if you have any questions or concerns before then.

Summary of Case: The Reports Analysis Division (RAD) referred the New York State Conference of the International Union of Operating Engineers Fed VPAF (NYS CONF IUOE FED VPAF) and Theron H. Hogle, Treasurer (Respondents or the Committee) for failing to disclose all its financial activity on its 2012 12 Day Pre-General Report. Respondents filed the original 2012 12 Day Pre-General Report on October 23, 2012. The Committee filed two Amended 2012 12 Day Pre-General Reports on July 16, 2013 to disclose additional disbursements of \$400,000.

Respondents contend that the Committee inadvertently omitted a transfer to an affiliated political committee when preparing the report. The Committee's information is sent to an outside entity for processing, and the disbursement of \$400,000 to EPEC was not included in the final report.