



FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

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**SENSITIVE**

Federal Election Commission  
Washington, DC 20463

**MEMORANDUM**

October 8, 2014

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP*

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

Lynn M. Fraser *LMF*  
Director, ADR Office

SUBJECT: ADR 738 Many Individual Conservatives Helping Elect Leaders  
Everywhere (MICHELEPAC) and Nancy H. Watkins, Treasurer,  
Informational Memo on Assignment

The Office of General Counsel referred RR 14L-33 on October 2, 2014 and the ADR Office designated the referral as ADR 738. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 738 on October 14, 2014. Please contact Lynn Fraser if you have any questions or concerns before then.

**Summary of Case:** RAD referred Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC) and Nancy H. Watkins, Treasurer<sup>1</sup> (the Committee or Respondents) amended its 2010 October Monthly, 2010 30 Day Post-General, 2010 Year End, 2011 February Monthly, 2011 April Monthly, 2011 May Monthly, and 2011 October Monthly Reports to disclose additional receipts of \$98,576.55 and additional disbursements of \$47,758.32, which were not disclosed in the original reports, an aggregate increase in activity totaling \$146,334.87.

Respondents contend that the majority of the increases in both receipts and disbursements were as a result of fundraising activity. The Committee inadvertently did not include all credit card transactions.

<sup>1</sup> Nancy H. Watkins, Treasurer (9/5113- Present), and Barry Arrington, Treasurer (7114/10- 9/4/13)

