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SENSITIVE

Federal Election Commission
Washington, DC 20463

MEMORANDUM

March 3, 2015

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

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

SUBJECT: ADR 739 Lynn Jenkins for Congress and Heather Grote,
Treasurer, Recommendation to Approve Settlement
Agreement

RESOLUTION TERM: Certify implementation of internal controls consistent with
those described in the Commission's Internal Controls and
Political Committees advisory document (2007) and the
Best Practices for Committee Management (published in
the April 2009 Record, available at
www.fec.gov/pages/brochures/bestpractices.shtml).

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 739 (RR 13L-33). The ADR Office received this referral on October 20, 2014.

SUMMARY: The Reports Analysis Division (RAD) referred the Committee for failing to disclose all financial transactions in violation of the FECA. The Committee filed a Miscellaneous Electronic Submission ("Form 99") on January 31, 2013 to disclose unauthorized disbursements totaling \$21,300 and the refund of the unauthorized disbursements totaling \$21,308.92.

Recommendation to Approve
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In the Form 99, Respondents contend that after transitioning to a new treasurer, the Committee became aware that the former treasurer was under investigation for possible misappropriation and immediately authorized an independent vendor to perform an audit. The audit uncovered three unauthorized disbursements totaling \$21,300 and the subsequent reimbursement in full of those funds making the campaign account whole.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Lynn Jenkins for Congress and Heather Grote, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.