



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

November 4, 2014

TO: The Commission

THROUGH: Alec Palmer *[Signature]*
Staff Director

FROM: Patricia C. Orrock *[Signature]*
Chief Compliance Officer

Lynn M. Fraser *[Signature]*
Director, ADR Office

SUBJECT: ADR 742 Texas Patriots PAC and William J. O'Sullivan, Jr.,
Treasurer, Informational Memo on Assignment

The Office of General Counsel referred RR 14L-29 on October 30 2014, and the ADR Office designated the referral as ADR 742. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 742 on November 7, 2014. Please contact Lynn Fraser if you have any questions or concerns before then.

Summary of Case: The Reports Analysis Division referred the Texas Patriots PAC and William J. O'Sullivan, Jr., Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2011 Year-End and 2012 October Quarterly Reports. The Committee filed its original 2011 Year-End Report on February 1, 2012. The Committee filed Amended 2011 Year-End Reports on February 25, 2012, March 12, 2012, May 24, 2012, May 30, 2012 and June 1, 2012 resulting in additional receipts of \$18,870.57 and disbursements of \$98,460.37. Respondents filed the original 2012 October Quarterly Report on October 13, 2012 and filed an Amended 2012 October Quarterly Report on October 22, 2012 resulting in additional disbursements of \$6,019.95.

In response to RFAs from the Commission, Respondents contend that failure to disclose all information resulted from a series of mishaps including the theft of a laptop with the data for the reports, health challenges of the Treasurer, and inadvertently omitted information.