



2016 DEC 13 PM 2:48

Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

December 13, 2016

TO: The Commission

THROUGH: Alec Palmer *SWH/fo*  
Staff Director

FROM: Patricia C. Orrock *PO/ME*  
Chief Compliance Officer

Lynn M. Fraser *LMF*  
Director, ADR Office

SUBJECT: ADR 818 Kumar for Congress and Seymour Hundley, Treasurer,  
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 16L-22 for processing on December 2, 2016, and the ADR Office designated the referral ADR 818. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 818 on December 16, 2016. Please contact Lynn Fraser if you have any questions or concerns before then.

**Summary of Case:** RAD referred Kumar for Congress and Seymour Hundley, Treasurer (Respondents or the Committee) for failing to disclose all financial transactions on its 2014 October Quarterly Report. Respondents filed their original 2014 October Quarterly Report on January 20, 2015. Respondents then filed Amended 2014 October Quarterly Reports on March 29, 2016 and May 5, 2016 that disclosed additional disbursements totaling \$180,828.04.

In addition, the Committee received \$41,201 in 2014 General Election contributions that were not refunded within the permissible timeframe following the candidate's loss in the 2014 Primary Election. The Committee received 2014 General Election contributions from nineteen (19) individuals that were not refunded within the permissible timeframe following the 2014 Primary Election on August 5, 2014. The \$41,201 in General Election contributions, first disclosed on the 2013 October Quarterly, 2013 Year-End and the 2014 April Quarterly Reports, were fully remedied by May 9, 2016.

The Committee contends that the errors and omissions in the 2014 election cycle reports were due to inexperience. Respondents contend that they hired individuals experienced in campaign finance and following an extensive review, amended reports were filed to correct the record.

UNCLASSIFIED