



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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September 21, 2017

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Krista J. Roche *KJR*
Acting Director, ADR Office

SUBJECT: ADR 839 McMullin for President Committee Inc. and Joel Searby,
Treasurer, Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RR 17L-14 to the Office of General Counsel (OGC) for processing on June 2, 2017, and OGC transferred the matter to the ADR Office on September 15, 2017. The ADR Office designated the referral ADR 839. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 839 on September 27, 2017. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: RAD referred McMullin for President Committee Inc. and Joel Searby, Treasurer, (Respondents or the Committee) for failing to disclose all financial activity. The Committee disclosed a total of \$578,101.47 in debts on amended reports all filed on November 7, 2016. The Committee filed an Amended 2016 September Monthly Report disclosing additional debts of \$169,759.20. The Committee filed an Amended 2016 October Monthly Report to disclose additional debts of \$339,389.57. The Committee also filed an Amended 12 Day Pre-General Report to disclose additional debts of \$68,952.70.

In a response filed by counsel, Respondents contend that invoices were inadvertently omitted from original reports due to a high volume of transactions occurring rapidly after the candidate's announcement, three months prior to the general election. Respondents contend that out of hundreds of invoices received and processed, only several that should have been subject to debt reporting were omitted from relevant reports.