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**SENSITIVE**



Federal Election Commission  
Washington, DC 20463

**MEMORANDUM**

October 12, 2017

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 843 American Financial Services Association PAC and Bill Himpler, Treasurer, Informational Memo on Assignment

The Audit Division (Audit) referred AR 17-06 to the Office of General Counsel (OGC), who transferred the matter to the ADR Office for processing on September 25, 2017. The ADR Office designated the referral ADR 843. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents within five (5) business days. Please contact Krista Roche if you have any questions or concerns.

**Summary of Case:** On July 21, 2017, the Commission approved the Final Audit Report for American Financial Services Association PAC and Bill Himpler, Treasurer, (Respondents or the Committee). In Finding 1, the Commission found that Respondents misstated financial activity. Specifically, for calendar year 2013, receipts were misstated by \$10,080.78 and disbursements were misstated by \$67,904.92. In addition, Respondents failed to disclose \$310,683 in receipts on original reports filed during the 2014 election cycle.

Respondents filed amended reports on January 13, 2016. However, these amendments did not correct the misstatements for receipts and disbursements in calendar year 2013. With regard to the failure to disclose receipts on original reports during the 2014 election cycle, Respondents filed amendments disclosing all but \$11,255 of those receipts.