



FEDERAL ELECTION COMMISSION  
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2018 SEP 11 PM 1:03

**SENSITIVE**

**MEMORANDUM**

September 11, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 887 Brian Higgins for Congress and Holly Giarraputo,  
Treasurer, Informational Memo on Assignment

The Audit Division referred AD 17-03 involving Brian Higgins for Congress and Holly Giarraputo, Treasurer, (Respondents or the Committee) for processing on September 10, 2018, and the ADR Office designated the referral ADR 887. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 887 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** Audit referred Respondents for one finding detailed in the Final Audit Report approved by the Commission on August 21, 2018. Finding 2 states that the Committee received excessive contributions totaling \$41,424.

In response to the exit conference, Respondents submitted presumptive reattribution and redesignation letters and sent letters to other contributors, untimely resolving excessive contributions totaling \$36,100. In response to the Interim Audit Report, Respondents untimely resolved the remaining excessive contributions, totaling \$5,400, by providing a completed reattribution letter signed by both contributors.