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**SENSITIVE**

**MEMORANDUM**

November 14, 2018

TO: The Commission

THROUGH: Alec Palmer *AP by KAH*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 891 Scholten 4Iowa Campaign Committee and Scott Hubay,  
Treasurer, Informational Memo on Assignment

The Office of General Counsel transferred MUR 7393 for processing on November 8, 2018, and the ADR Office designated the referral ADR 891. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 891 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** On May 31, 2018, Lori Adams filed a Complaint alleging that Scholten4Iowa Campaign Committee and Scott Hubay, Treasurer (Respondents or the Committee) failed to include a "paid for" disclaimer on a mass mailing distributed to the public.

The Committee acknowledges that a disclaimer should have been included on the mailing. Respondents contend that since this error occurred, they took steps to ensure errors of this nature do not occur in the future. The Committee retained a new treasurer experienced in federal campaigns, a new campaign manager familiar with disclaimer requirements, and a more experienced direct mail vendor.