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**SENSITIVE**

**MEMORANDUM**

March 5, 2019

**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 900 Brill for Congress and David H. Brill, Treasurer,  
Informational Memo on Assignment

The Office of General Counsel referred MUR 7539 for processing on February 15, 2019, and the ADR Office designated the referral ADR 900. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 900 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** On November 9, 2018, Jonathan Lines, Chairman of the Arizona Republican Party, filed a Complaint alleging that Brill for Congress and David Brill, Treasurer (Respondents or the Committee) engaged in non-commercial air travel to conduct campaign activities, which the Complaint alleges is a prohibited/excessive, in-kind contribution.

In a response dated December 12, 2018, the Respondents indicate that they were unaware that the "FEC forbade the use of non-commercial aircraft by congressional candidates." Further, the Respondents admit that they are "fully accountable for the campaign" and any errors that occurred while Mr. Brill was both candidate and treasurer, due to staff turnover.