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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

MEMORANDUM

March 6, 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 902 Troopien for US Senate and Christopher M. Marston,
Treasurer, Informational Memo on Assignment

The Office of General Counsel referred P-MUR 622 for processing on February 22, 2019, and the ADR Office designated the referral ADR 902. We include a summary and discussion of the referral for your information. We expect initiating communication with Respondents in ADR 902 within five (5) business days. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: Troopien for U.S. Senate and Chris Marston, Treasurer (Respondents or the Committee) filed a *sua sponte* submission dated January 29, 2019, indicating that they failed to disclose all financial activity on the 2018 October Quarterly Report originally filed on October 15, 2018. The *sua sponte* submission states that they omitted \$45,000 in receipts and \$45,000 in disbursements.

In the *sua sponte* submission, Respondents state that the omissions were the result of an inadvertent error that occurred when regular reconciliation procedures failed to detect a payment made on the candidate's personal credit card. The Committee states that it was largely funded by the candidate and that the omitted disbursement was to a vendor already included on the original report. The Committee states that it performed a year-end review of the candidate's personal credit card statements and discovered the errors. The Committee filed an Amended 2018 October Quarterly Report on January 29, 2019 disclosing the omitted financial activity. Further, the *sua sponte* submission explains that while the Committee is winding

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down activity, if it becomes active in another election cycle, it will adopt policies to ensure that errors of this nature will not happen again.