



FEDERAL ELECTION COMMISSION  
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2019 OCT -8 AM 9:28

**SENSITIVE**

**MEMORANDUM**

October 8, 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

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Informational Memo on Assignment  
ADR 935 – South Dakota Democratic Party and  
Paula Hawks, Treasurer (C00160937)

The Reports Analysis Division referred RAD 19L-31 for processing on September 12, 2019, and the ADR Office designated the referral ADR 935. This office intends to notify Respondents after five business days. If you have any questions or concerns, please contact the ADR Office.

**Summary of Case:** RAD referred South Dakota Democratic Party and Paula Hawks, Treasurer, (Respondents or the Committee) for a series of reporting errors and other FECA violations during the 2017-2018 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's errors included, among other items: excessive, prohibited and other impermissible contributions or transfers, mathematical discrepancies, failure to provide supporting schedules, failure to properly itemize disbursements, and allocated federal and non-federal activity.