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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

June 30, 2020

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

Joshua A. Rebollozo *JAR*  
ADR Specialist, ADR Office

SUBJECT: Informational Memo on Assignment  
ADR 968 - Friends of John Delaney and Edward P. Nordberg, Jr.,  
Treasurer (C00508416)

The Reports Analysis Division (RAD) referred RAD 20L-10 for processing on June 8, 2020, and the ADR Office designated the referral ADR 968. 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 Friends of John Delaney and Edward P. Nordberg, Jr., Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2019 Year-End Report, originally filed on January 31, 2020. On February 20, 2020, the Committee filed an Amended 2019 Year-End Report including \$428,570 in additional receipts and \$428,570 in additional disbursements.

In a statement included on the Amended 2019 Year-End Report, filed February 20, 2020, the Committee stated that the in-kind contribution was inadvertently omitted from the original report due to a clerical error.

On the 2020 February Monthly Report, filed February 20, 2020, the Committee reported an offset of \$125,802.25 for a refund "of previous over charge." In a

subsequent Form 99 (Miscellaneous Electronic Submission), filed on March 2, 2020, the Committee stated that the offset disclosed on the 2020 February Monthly Report was a refund for an overpayment related to the in-kind contribution from the candidate reported on the Amended 2019 Year-End Report.