



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 8, 2014

MEMORANDUM

To: The Commission

Through: Alec Palmer
Staff Director

From: Patricia C. Orrock *PC/PCO*
Chief Compliance Officer

Thomas E. Hintermister *TH*
Assistant Staff Director
Audit Division

Zuzana O. Pacious *ZOP*
Audit Manager

Kendrick Smith *KS*
Audit Manager

By: Jim Miller *JM*
Lead Auditor

Subject: Audit Division Recommendation Memorandum on the Joe Walsh for
Congress Committee, Inc. (JWFC) (A13-01)

Pursuant to Commission Directive No. 70 (FEC Directive on Processing Audit Reports), the Audit staff presents its recommendations below and discusses the findings in the attached Draft Final Audit Report (DFAR). The Office of General Counsel has reviewed this memorandum and concurs with the recommendations.

Finding 1. Disclosure of Occupation/Name of Employer

JWFC did not submit a response to the Interim Audit Report. In response to the DFAR, JWFC filed amended disclosure reports that materially complied with the recommendation.

The Audit staff recommends that the Commission find that JWFC failed to disclose occupation/name of employer information for contributions from individuals totaling \$334,146 and did not demonstrate "best efforts" to obtain, maintain, and submit disclosure information with respect to these contributions.

Finding 2. Receipt of Contributions in Excess of the Limit

JWFC did not submit a response to the Interim Audit Report. In response to the DFAR, JWFC provided letters sent to contributors for contributions totaling \$60,125 that were eligible for presumptive redesignation/retribution. The Audit staff considers the \$60,125 as excessive contributions that have been resolved untimely.

The Audit staff recommends that the Commission find that JWFC received excessive contributions totaling \$92,325.¹

JWFC did not request an audit hearing.

If this memorandum is approved, a Proposed Final Audit Report will be prepared within 30 days of the Commission's vote.

In case of an objection, Directive No. 70 states that the Audit Division Recommendation Memorandum will be placed on the next regularly scheduled open session agenda.

Documents related to this audit report can be viewed in the Voting Ballot Matters folder. Should you have any questions, please contact Jim Miller or Zuzana Pacious at 694-1200.

Attachment:

- Draft Final Audit Report of the Audit Division on the Joe Walsh for Congress Committee, Inc.

cc: Office of General Counsel

¹ This amount consists of excessive contributions resolved untimely (\$71,125) and excessive contributions resolvable only by a refund to contributors or disgorgement to the U.S. Treasury (\$21,200). \$92,325 = \$(71,125 + 21,200).