



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

March 9, 2011

TO: The Commission

THROUGH: Alec Palmer  
Acting Staff Director *AP*

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Lynn M. Fraser *LF*  
Director, ADR Office

SUBJECT: ADR 562 Joe Miller for Senate and Bernadette C. Koppy, Treasurer,  
Informational Memo on Assignment

The Office of General Counsel (OGC) referred Joe Miller for Senate and Bernadette C. Koppy Treasurer and Thomas R. Wickwire (collectively Respondents), and the ADR Office designated the referral as ADR 562. The EPS Report is placed in the VBM folder for your review. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 562 on March 11, 2011. Please contact Lynn Fraser if you have any questions or concerns before then.

**Summary of Case:** OGC referred MUR 6426 in which the complaint alleges that Joe Miller for Senate and Bernadette C. Koppy, Treasurer (the Committee) and Thomas Wickwire (Respondent Wickwire) did not properly disclose transactions associated with campaign flights in which the Committee used a private plane owned Respondent Wickwire in violation of the FECA. The complaint further alleges that the reports filed by the Committee failed to disclose, or disclosed inaccurately, expenditures for flights during the campaign.

The Committee contends that while it may not have reimbursed Respondent Wickwire sufficiently to fully comply with the regulations based on an incorrect understanding of the law following a discussion with the FEC, it did, after consulting with counsel, reimburse Respondent Wickwire \$3,030 and file

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