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SENSITIVE

MEMORANDUM

June 27, 2012

TO: The Commission

THROUGH: Alec Palmer
Staff Director

FROM: Patricia Carmona
Chief Compliance Officer

Lynn M. Fraser
Director, ADR Office

SUBJECT: ADR 620 National Association of Professional Employer Organizations,
National Association of Professional Employer Organizations PAC and
Thom Stohler, Treasurer, Informational Memo on Assignment

The Office of General Counsel referred Pre-MUR 541 on June 21, 2012, and the ADR Office designated the referral as ADR 620. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 620 on June 29, 2012. Please contact Lynn Fraser if you have any questions, comments or concerns before then.

Summary of Case: In a *sua sponte* submission, the National Association of Professional Employer Organizations ("NAPEO"), on behalf of itself and its separate segregated fund, the National Association of Professional Employer Organizations PAC and Thom Stohler, Treasurer (Respondents or the Committee or collectively "Respondents") acknowledges that it failed to file an amended Statement of Organization after the departure of the PAC's treasurer; signed the former treasurer's name on its year-end report; and filed its 2011 year-end report late. NAPEO maintains that the violations resulted from extensive personnel turnover, including the resignation of the Committee's chairman and treasurer in August 2011.

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