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Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

June 20, 2013

TO: The Commission

THROUGH: Alec Palmer  
Staff Director

FROM: Patricia C. Orrock  
Chief Compliance Officer

Lynn M. Fraser  
Director, ADR Office

SUBJECT: ADR 640 4<sup>th</sup> Congressional District Republican Party of Minnesota and Beverly Aplikowski, Treasurer, *et al.* Informational Memo on Assignment

The Office of General Counsel (OGC) referred MUR 6700 on June 4, 2013, and the ADR Office designated the referral as ADR 640. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 640 on June 25, 2013. Please contact Lynn Fraser if you have any questions, comments or concerns before then.

**Summary of Case:** The OGC referred a complaint filed by John Kysylyczyn alleges the 4<sup>th</sup> Congressional District Republican Party of Minnesota and Beverly Aplikowski, Treasurer (the Committee), Skip Wolverton, former Treasurer (Respondent Wolverton) and former Chairman of the 4<sup>th</sup> Congressional District Republican Party of Minnesota, James Carson (Respondent Carson) (collectively Respondents) violated by FECA. Complainant alleges the violations occurred due to a failure to file disclosure reports timely, improperly obtaining an administrative termination, a failure to have adequate disclaimers on fundraising documents, and a failure to proportion event costs between federal and non-federal accounts.

In their responses, Respondents contend there were some reports not filed timely due to confusion over an administrative termination of the Committee's reporting obligations by the Commission, that the fundraising referred to by Complainant was a convention and not a fund raising event, and that the convention fees were not federal election activity.

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