



Federal Election Commission
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SENSITIVE

MEMORANDUM

April 6, 2015

TO: The Commission

THROUGH: Alec Palmer *EWP/for*
Staff Director

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

Lynn M. Fraser *LMF*
Director, ADR Office

BY: Krista J. Roche *KJR*
Assistant Director, ADR Office

SUBJECT: ADR 751 and ADR 753 Friends of Edwin W. Edwards and
Rachelle Marks, Treasurer, Informational Memo on Assignment

The Office of General Counsel transferred MUR 6833 and P-MUR 573 for processing on March 16, 2015, and the ADR Office designated the matters ADR 751 and ADR 753, respectively. The EPS Report is placed in the Voting Ballot Matters folder for your review. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in these matters on April 9, 2015. Please contact Krista Roche if you have any questions or concerns before then.

Summary of Case: On May 19, 2014, Bryan Jeansonne filed a complaint against Friends of Edwin W. Edwards and Rachelle Marks, Treasurer (Respondents or the Committee) for failing to include a "paid for" disclaimer and applicable contribution limits on a fundraiser invitation, which was distributed by the candidate's wife via Facebook.

In response to the allegations, the Committee filed a *sua sponte* submission on May 20, 2014, indicating that supporters outside the campaign hosted a fundraiser and prepared and distributed the invitation. The invitation included the contribution limits, but failed to include a "paid for" disclaimer. The Committee

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states that the invitation was publicized on Facebook by the candidate's wife and the campaign, but the screenshot of the invitation cropped out the contribution limits. Respondents assert that when they became aware of the violations, they removed the posts and posted notice of the error on the campaign's website and Facebook page. The Committee also indicates that it implemented new procedures to ensure errors of this nature do not occur in the future, including routing all proposed invitations (both internally and externally prepared) through the accounting firm to confirm compliance with federal laws prior to dissemination.