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Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

October 21, 2015

TO: The Commission

THROUGH: Alec Palmer *[Signature]*  
Staff Director

FROM: Patricia C. Orrock *[Signature]*  
Chief Compliance Officer

Lynn M. Fraser *[Signature]*  
Director, ADR Office

BY: Krista J. Roche *[Signature]*  
Assistant Director, ADR Office

SUBJECT: ADR 781 Sharon Sund for Congress and Eugene Roberson,  
Treasurer, Informational Memo on Assignment

The Office of General Counsel transferred MUR 6890 on September 18, 2015, and the ADR Office designated the referral as ADR 781. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 781 on October 27, 2015. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** On October 16, 2014, Nicholas A. Passanante, of BoulderStrategies LLC, (Complainant) filed a complaint against Sharon Sund for Congress and Eugene Roberson, Treasurer. (Respondents or the Committee) for failing to disclose a debt. The Complainant alleges that BoulderStrategies LLC was owed \$14,840.82, which was not reflected on the Committee's 2014 October Quarterly Report.

In response to the Complaint, the Committee asserts that the debt was disputed and eventually settled for \$11,000, after an initial offer of \$9,500 was rejected. The Committee reported two debts of \$6,500 and \$4,500 (totaling \$11,000) to BoulderStrategies LLC on its 2014 30 Day Post-General Report. The \$4,500 debt

is shown as paid on the Committee's 2014 Year-End Report and the \$6,500 debt is shown as paid on the Committee's 2015 April Quarterly Report.