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Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

March 22, 2016

TO: The Commission

THROUGH: Alec Palmer *EWL for*
Staff Director

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

Lynn M. Fraser *LF*
Director, ADR Office

SUBJECT: ADR 798 Cotton for Senate and Theodore V. Koch, Treasurer,
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 16L-04 for processing on March 18, 2016, and the ADR Office designated the referral ADR 798. We included a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 798 on March 25, 2016. Please contact Lynn Fraser if you have any questions or concerns before then.

Summary of Case: RAD referred Cotton for Senate and Theodore V. Koch, Treasurer (Respondents or the Committee) for failing to disclose all receipts on its original 2014 30 Day Post-General Report. The Committee filed Amended 2014 30 Day Post-General Reports on January 30, 2015, April 15, 2015 and a final amended report on October 19, 2015 that disclosed additional receipts of \$155,050.

In a FEC Form 99 filed January 13, 2016, the Committee asserted, in part, that after conducting an internal audit, it was determined that an amended report needed to be filed. " ... Specifically, it was determined that a \$150,000 vendor refund was more properly disclosed on the 2014 30-Day Post General Report than on the 2014 Year-End Report. Also, on the 2014 30-Day Post General Report, there were two previously unidentified online credit card contributions that amount to \$5,200 and a chargeback of -\$150 that was disclosed. The total changes added \$150,050 ..."

Memo on Assignment
ADR 798 (RAD 16L-04)
Page 1