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NAME OF COMMITTEE (In Full)
Google LLC NetPAC

FEC IDENTIFICATION NUMBER
C00428623

Mailing Address 25 Massachusetts Ave. NW
9th Floor

City State ZIP Code
Washington DC 20001

January 29, 2021

Michael Adamsky
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
1050 First Street NE
Washington, DC 20463

Re: Google LLC NetPAC (C00428623) Misappropriated Funds

Dear Mr. Adamsky:

Google LLC NetPAC ("Committee?") submits this Form 99 Miscellaneous Report in response to the recent discovery, on December 29, 2020, that Committee funds were misappropriated.

In December 2020, an unknown, unauthorized, external party cashed three counterfeit checks from the Committee's Wells Fargo Bank account: (1) a check dated December 15, 2020 in the amount of \$875.96; (2) a check dated December 17, 2020 in the amount of \$807.86; and (3) a check dated December 20, 2020 in the amount of \$876.78. The first two checks were cashed on December 18, 2020, and the third check was cashed on December 24, 2020. In total, \$2,560.60 of the Committee's funds were misappropriated.

The Committee notified the Commission on January 12, 2021 of the misappropriation and has been working with the Reports Analysis Division to ensure that its reports properly reflect this matter.

The reported cash-on-hand balance in the Year-End 2020 report, filed today, accurately reflects the Committee's actual bank balance, as the misappropriation was identified prior to filing the report.

This matter has been reported to the Committee's bank, Wells Fargo Bank, and its Check Fraud Division is reviewing the matter. The Committee has not notified law enforcement.

Furthermore, the Committee has instituted a system of "positive pay" through Wells Fargo Bank, which will prevent similar misappropriation in the future. Positive Pay systematically compares checks presented for payment to the Committee's issued-check files to detect serial numbers and dollar amounts that do not match. (See, Wells Fargo Bank, "Payments Fraud," <https://www.wellsfargo.com/com/fraud/payments-fraud/>.) If a check is submitted to Wells Fargo Bank that has not been issued by the Committee, the Positive Pay system will flag it and alert the Committee prior to it clearing the account.

We hope this information resolves any questions you may have about this report. If you require any additional information, please feel free to contact Erin Lama, external counsel for the Committee.

Sincerely,

Seth Webb
Assistant Treasurer
Google LLC NetPAC