



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 8, 2021

Susan Fino, Treasurer  
LAFAYETTE COUNTY DEMOCRATIC PARTY  
1030 AUGUSTA DRIVE  
Oxford, MS 38655

**Response Due Date  
November 29, 2021**

Re: ADR 1052 (RR 20L-11) & ADR 1053 (P-MUR 645)  
LAFAYETTE COUNTY DEMOCRATIC PARTY and Susan Fino, Treasurer  
(C00532788)

Dear Susan Fino:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Office of General Counsel was based on your *sua sponte* submission which reflects a possible failure to comply with the Federal Election Campaign Act of 1971, as amended, by LAFAYETTE COUNTY DEMOCRATIC PARTY.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with LAFAYETTE COUNTY DEMOCRATIC PARTY and Susan Fino, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement would conclude the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

The Reports Analysis Division (RAD) referred LAFAYETTE COUNTY DEMOCRATIC PARTY and Martha M. Scott, Treasurer (Respondents or the Committee) for disclosing apparent unauthorized disbursements totaling \$13,500 in its 2019 Mid-Year Report. On

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
1050 FIRST STREET N.E., WASHINGTON, DC 20463  
TELEPHONE: (202) 694-1136  
EMAIL: JREBOLLOZO@FEC.GOV

November 24, 2020 Respondents filed a *sua sponte* submission stating that the Committee's previous treasurer, Hunter Pace, issued checks to himself and his corporation and made debit card withdrawals for personal expenses from the Committee's bank account totaling \$14,235.87.

The Committee stated in its November 24, 2020 *sua sponte* submission that it removed Mr. Pace as treasurer immediately after learning of the unauthorized disbursements. In addition, the Committee stated that it has drafted and proposed new internal controls and is considering the feasibility of hiring an outside accountant for bookkeeping services.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days from the date of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing.

This matter has been designated as **ADR 1052**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,



Joshua A. Rebollozo  
Assistant Director  
Alternative Dispute Resolution Office