



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

January 6, 2014

James Bennett, Treasurer  
Friends of Jim Clyburn  
P.O. Box 12567  
Columbia, SC 29211

Re: ADR 674 (RAD 13L-53)  
Friends of Jim Clyburn and James Bennett, Treasurer

Dear Mr. Bennett:

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 Reports Analysis Division (RAD) was based on a review of reports filed by the Friends of Jim Clyburn which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

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 the Friends of Jim Clyburn and James Bennett, 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 concludes 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:

**SUMMARY:** RAD referred the Friends of Jim Clyburn and James Bennett, Treasurer (Respondents or the Committee) for failing to disclose all financial transactions on their 2013 April Quarterly Report. The Committee filed its original 2013 April Quarterly

Report on April 15, 2013. Respondents filed an Amended 2013 April Quarterly Report on July 15, 2013 that disclosed additional disbursements of \$100,775.

Respondents stated in a form 99 filed on September 13, 2013 that the omission occurred due to a miscommunication between the staff. In addition, the Committee had not received a current bank statement at the time the report was filed. Respondents stated that changes in financial procedures were made to ensure this does not reoccur.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondents 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 of receipt 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, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 674**. 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,

Lynn M. Fraser, Director  
Alternative Dispute Resolution Office  
202-694-1665

Enclosures: ADR Frequently Asked Questions  
Commitment to Submit Matter to ADR  
Designation of Representative/Counsel