



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

September 24, 2014

Gustavo Biscardi, Treasurer  
JBS LLC USA PAC  
1770 Promontory Circle  
Greeley, CO 80634

Re: ADR 735 (RAD 14L-32)  
JBS LLC USA PAC and Gustavo Biscardi, Treasurer

Dear Mr. Biscardi:

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 JBS LLC USA PAC 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 JBS LLC USA PAC and Gustavo Biscardi, 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:

RAD referred Respondents or the for misdepositing funds totaling \$55,501.73 during the 2013 calendar year that were originally intended for the Committee's connected organization, which were not remedied within the permissible timeframe.

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

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
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EMAIL: KROCHE@FEC.GOV

14-1060000-1

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 735**. 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



Krista J. Roche  
Assistant Director  
Alternative Dispute Resolution Office

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