



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 7, 2014

William J. O'Sullivan, Jr., Treasurer
Texas Patriots PAC
14 Petalcup Place
The Woodlands, TX 77381

Re: ADR 742 (RR 14L-29)
Texas Patriots PAC and William J. O'Sullivan, Jr., Treasurer

Dear Mr. O'Sullivan:

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 Texas Patriots 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 the Texas Patriots PAC and William J. O'Sullivan, Jr., 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: The Reports Analysis Division referred the Texas Patriots PAC and William J. O'Sullivan, Jr., Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2011 Year-End and 2012 October Quarterly Reports. The Committee filed its original 2011 Year-End Report on February 1, 2012.

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE
999 E STREET N.W., WASHINGTON, DC 20463
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The Committee filed Amended 2011 Year-End Reports on February 25, 2012, March 12, 2012, May 24, 2012, May 30, 2012 and June 1, 2012 resulting in additional receipts of \$18,870.57 and disbursements of \$98,460.37. Respondents filed the original 2012 October Quarterly Report on October 13, 2012 and filed an Amended 2012 October Quarterly Report on October 22, 2012 resulting in additional disbursements of \$6,019.95.

In response to RFAs from the Commission, Respondents contend that the failure to disclose all information resulted from a series of mishaps, including the theft of a laptop with the data for the reports and significant health challenges of the Treasurer. In addition, in rebuilding the data base, some information was inadvertently omitted.

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 Participate in 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 742**. 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 Participate in ADR
Designation of Representative/Counsel