



Federal Election Commission  
Washington, DC 20463

February 19, 2015

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:

Enclosed is the signed copy of the agreement resolving the referral initiated on October 30, 2014 by the Federal Election Commission ("FEC/Commission") involving Texas Patriots PAC and William J. O'Sullivan, Jr, Treasurer ("Respondents"). The agreement for ADR 742 (RR 14L-29) was approved by the Commission on February 9, 2015 – the effective date of the agreement.

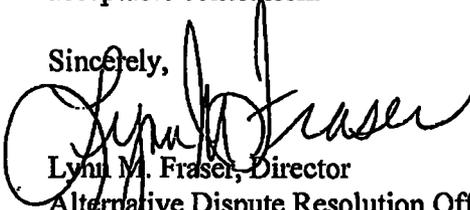
Note the specific time frames for compliance in paragraph 6 of the agreement. Please forward to this office, a statement certifying Respondent's compliance with the terms listed in the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 6, and contain the ADR caption and case number. The civil penalty payment should be sent to the attention of the Accounting/Finance Office of the FEC. The civil penalty under the agreement is due on or before March 9, 2015.<sup>1</sup> Please put the ADR case number on the civil penalty check as well, to ensure crediting to the correct case.

As you are aware, the settlement agreement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our entry into settlement negotiations and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

<sup>1</sup> Please note, if the Commission refers an unpaid civil penalty to the US Treasury or third party collection agent, additional costs and fees will be assessed.

This agreement resolves the matter that was initiated by the Commission pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities regarding violations of federal election campaign laws. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,



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

Enclosure: Agreement

cc: Gwen Holmes and Adam Liu, Finance and Accounting Office  
Room 819

1-00000000-001



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Washington, DC 20463

Case Number: ADR 742  
Source: RR 14L-29  
Case Name: Texas Patriots PAC

### NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with William J. O'Sullivan, Jr., representing the Texas Patriots PAC and William J. O'Sullivan, Jr., in his official capacity as Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109 (formerly 2 U.S.C. § 437g).
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Reports Analysis Division (RAD) referred Respondents 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, followed by Amended 2011 Year-End Reports on February 25, 2012, March 12, 2012, May 28, 2012, May 30, 2012, and June 1, 2012. These Amended 2011 Year-End Reports resulted 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. The amended reports disclosed an aggregate increase in activity totaling \$123,350.89.
4. Treasurers of political committees are required to report all financial activity, including all receipts, and disbursements pursuant to the FECA. 52 U.S.C. §§ 30104(b)(2) and (4), (formerly 2 U.S.C. §§ 434(b)(2) and (4), 11 C.F.R. §§ 104.3(a) and (b).



