



Federal Election Commission  
Washington, DC 20463

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**SENSITIVE**

MEMORANDUM

June 17, 2015

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Lynn M. Fraser *LMF*  
Director, ADR Office

BY: Krista J. Roche *KJR*  
Assistant Director, ADR Office

SUBJECT: ADR 751 & ADR 753 Friends of Edwin W. Edwards, Rachelle Marks,  
Treasurer, and Trina Edwards, Assistant Treasurer  
Recommendation to Dismiss

The Office of General Counsel (OGC) referred MUR 6833 and P-MUR 573, and the ADR Office designated the matters as ADR 751 and ADR 753, respectively. The ADR Office recommends the Commission exercise prosecutorial discretion and dismiss the matters. *Heckler v. Chaney* 470 U.S. 821 (1985). We include a summary and discussion of the matters for your information.

**Summary and Analysis of Case:** On May 19, 2014, Bryan Jeansonne filed a complaint against Friends of Edwin W. Edwards, Rachelle Marks, Treasurer, and Trina Edwards, Assistant Treasurer and wife of the candidate (Respondents or the Committee) for failing to include a "paid for" disclaimer and applicable contribution limits on a fundraiser invitation that was distributed by the candidate's wife via Facebook.

In response to the allegations, the Committee filed a *sua sponte* submission on May 20, 2014, indicating that supporters outside the campaign hosted a fundraiser and prepared and distributed the invitation. The invitation included the contribution limits but failed to include a "paid for" disclaimer. The Committee states that the invitation was publicized



**RECOMMENDATION:**

1. Dismiss ADR 751 (MUR 6833) and ADR 753 (P-MUR 573), and close the files.
2. Approve the appropriate letters.