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Federal Election Commission  
Washington, DC 20463

**SENSITIVE**

**MEMORANDUM**

April 20, 2015

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

BY: Lynn M. Fraser *JW*  
Director, ADR Office

SUBJECT: Krista J. Roche *JK*  
Assistant Director, ADR Office

ADR 755 Friends of George Demos and Robert Cole, Treasurer,  
Informational Memo on Assignment

The Reports Analysis Division (RAD) referred RAD 15L-08 for processing on April 15, 2015, and the ADR Office designated the referral ADR 755. We include a summary and discussion of the referral for your information. We anticipate initiating communication with Respondents in ADR 755 on April 27, 2015. Please contact Krista Roche if you have any questions or concerns before then.

**Summary of Case:** RAD referred Friends of George Demos and Robert Cole, Treasurer (Respondents or the Committee) for failure to refund or redesignate 2014 General Election contributions totaling \$46,400 within the permissible timeframe following the candidate's loss in the 2014 Primary Election held on June 24, 2014.

In a Miscellaneous Electronic Submission (Form 99) filed on November 25, 2014, Respondents indicated that all General Election contributions were refunded on October 1, 2014.



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

April 29, 2015

Friends of George Demos  
Robert Cole, Treasurer  
P.O. Box 378  
Ronkonkoma, NY 11779

Re: ADR 755 (RAD 15L-08)  
Friends of George Demos and Robert Cole, Treasurer

Dear Mr. Cole:

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 Friends of George Demos 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 Friends of George Demos and Robert Cole, 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 for failure to refund or redesignate 2014 General Election contributions totaling \$46,400 within the permissible timeframe following the candidate's loss in the 2014 Primary Election held on June 24, 2014.

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In a Miscellaneous Electronic Submission (Form 99) filed on November 25, 2014, Respondents indicated that all General Election contributions were refunded on October 1, 2014.

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 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 755. 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