



Federal Election Commission
Washington, DC 20463

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SENSITIVE

MEMORANDUM

August 19, 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 755 Friends of George Demos and Robert Cole,
Treasurer, Recommendation to Approve Settlement
Agreement

RESOLUTION TERMS: Pay a civil penalty of \$1,000; and work with Commission
staff to terminate political committee status and reporting
obligations.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 755 (RAD 15L-08). The ADR Office received this referral on April 15, 2015.

SUMMARY: The Reports Analysis Division (RAD) referred Friends of George Demos and Robert Cole, Treasurer, (Respondents or the Committee) for a 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.

On November 25, 2014, the Committee filed an Amended 2014 July Quarterly Report. Within that report, the Committee provided a Miscellaneous Electronic Submission (Form 99) in which Respondents indicated that all General Election

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contributions were refunded on October 1, 2014. Further, during negotiations Respondents contended that while there was a delay in the refunds, none of the general election contributions were spent by the Committee, all contributions were timely and properly disclosed upon receipt, and all contributions in question were from permissible sources. The Committee asserts that it now wishes to terminate its political committee status.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Friends of George Demos and Robert Cole, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.