



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

October 13, 2015

Thomas E. Montgomery, III, Treasurer  
Vanila Singh for Congress 2014  
PO Box 14037  
Freemont, CA 94539

Re: ADR 782 (RAD 15L-35)  
Vanila Singh for Congress 2014 and Thomas E. Montgomery, III, Treasurer

Dear Mr. Montgomery:

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 Vanila Singh for Congress 2014 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 , Vanila Singh for Congress 2014 and Thomas E. Montgomery, III 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:** RAD referred Vanila Singh for Congress 2014 and Thomas E. Montgomery III, Treasurer (Respondents or the Committee) for failing to remedy impermissible 2014 General Election contributions within the permissible timeframe. Candidate Vanila Singh lost the 2014 Primary Election. Respondents received 2014

General Election contributions totaling \$30,755 from thirteen (13) individuals, which were not remedied within sixty (60) days of receipt.

Respondents contend they did eventually refund the contributions, albeit untimely.

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 782**. 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