



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 17, 2017

Richard R. Rios, Esq.  
Olson, Hagel & Fishburn  
3605 Long Beach Blvd  
Suite 426  
Long Beach, CA 90807

Re: ADR 844 (RAD 17L-38)  
Jimmy Gomez for Congress and Mary Hodge, Treasurer

Dear Mr. Rios:

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 was based on a review of reports filed by Jimmy Gomez for Congress 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 Jimmy Gomez for Congress and Mary Hodge, 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:

**Summary of Case:** RAD referred Jimmy Gomez for Congress and Mary Hodge, Treasurer, (Respondents or the Committee) for failing to disclose all financial activity on their original 2017 12 Day Pre-Special General Report filed on March 23, 2017. The Committee filed an Amended 2017 12 Day Pre-Special General Report disclosing \$113,127 in debts not previously disclosed on March 31, 2017, eight days after the

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
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original report and four days prior to the election. Subsequently, the Committee amended their 2017 12 Day Pre-Special General Report several times disclosing a total of \$130,114.76 in debts not included on the original report.

Respondents contend in a Miscellaneous Electronic Submission (FEC Form 99) filed on September 5, 2017, in response to a Request For Additional Information that the errors occurred due to a staff misunderstanding of reporting requirements regarding debt owed to vendors, and that as soon as the error was discovered an amended report was filed which disclosed most of the debt at issue. The Committee indicates that it has instituted training for campaign staff members and volunteers regarding disclosure requirements and instituted procedures regarding vendor invoices to ensure accurate and timely reporting.

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 from the date 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 844**. 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  
Acting Director  
Alternative Dispute Resolution Office

Enclosures: ADR Frequently Asked Questions  
Commitment to Participate in ADR & Designation of Representative/Counsel