



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 25, 2017

Charles H. Bell, Jr.  
Bell, McAndrews and Hiltachk  
455 Capitol Mall, Suite 600  
Sacramento, CA 95814

Re: ADR 846 (RR 16L-06)  
Rohrabacher for Congress and Jen Slater, Treasurer

Dear Jen Slater:

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 Commissioners was based on a review of reports filed by Rohrabacher 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 Rohrabacher for Congress and Jen Slater, 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 failing to disclose all financial activity. The Committee filed amended reports for reporting periods in 2013, 2014, and 2015 revealing, in total, \$39,095.79 of deposits from the former treasurer and \$226,425.48 of unauthorized disbursements.

In its July 2016 Response to the Referral, the Committee explained that it made internal changes to prevent future embezzlement. The Committee opened a new bank account, hired a well-regarded campaign reports specialist to take over as treasurer, and "implemented review of the Committee's reports in accordance with the Commission's recommendations of methods to prevent unauthorized withdrawals of committee funds."

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 846**. 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