



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 14, 2018

Zachary Parks, Esq.  
COVINGTON & BURLING  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956

Re: ADR 870 (RAD 18L-18)  
Eugene Ludwig

Dear Mr. Parks:

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 Eugene Ludwig 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 Eugene Ludwig (Respondent). 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 Respondent decides 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 Eugene Ludwig (Respondent) for failing to file one (1) 24-Hour Report totaling \$49,462.21 to support two (2) independent expenditures disclosed on the 2016 Year-End Report.

In a Miscellaneous Electronic Submission (Form 99) filed on December 12, 2017, the Respondent indicates that the independent expenditures were disclosed on a late 24-hour report filed on September 7, 2017. The Respondent filed a 24-Hour report covering these expenditures on September 7, 2017.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent 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 870**. 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,

KJ Roche

Krista J. Roche

Director

Alternative Dispute Resolution Office

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