



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 26, 2018

Drue Kinchen, Treasurer
Urban Victory Fund (UVF)
13001 Justice Ave
Baton Rouge, LA 70816

Re: ADR 873 (RR 17-14R)
Urban Victory Fund (UVF) and Drue Kinchen, Treasurer

Dear Drue Kinchen:

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 Office of General Counsel was based on a review of reports filed by Urban Victory Fund (UVF) 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 Urban Victory Fund (UVF) and Drue Kinchen, 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:

The Commission approved the Audit Division to transfer this referral from the Reports Analysis Division to the Office of General Counsel. The Office of General Counsel subsequently transferred Urban Victory Fund (UVF) and Drue Kinchen, Treasurer, (Respondents or the Committee) to the ADR Office for a series of reporting errors and other FECA violations during the 2015-2016 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission

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determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's reporting errors included, among other items the receipt of apparent excessive contributions totaling \$124,516 and failing to disclose \$30,000 in independent expenditures on Schedule E of the 2016 30 Day Post-General Report, which were previously disclosed on a 48-Hour Report.

Respondents contend that there were reporting challenges during the 2016 election cycle because they were unaware of reporting deadlines. Additionally, Respondents contend that they are an independent expenditure only committee and therefore, should not have excessive receipts.

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 873**. 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

Krista J. Roche

Director

Alternative Dispute Resolution Office

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