



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 14, 2019

David Brill, Treasurer  
Brill for Congress  
426 S. Alarcon  
Prescott, AZ 86303

Re: ADR 900 (MUR 7539)  
Brill for Congress and David Brill, Treasurer

Dear David Brill:

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 complaint filed by Jonathan Lines of the Arizona Republican Party which alleges a violation of the Federal Election Campaign Act of 1971, as amended, by Brill for Congress.

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 Brill for Congress and David Brill, 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:

On November 9, 2018, Jonathan Lines, Chairman of the Arizona Republican Party, filed a Complaint alleging that Brill for Congress and David Brill, Treasurer (Respondents or the Committee) engaged in non-commercial air travel to conduct campaign activities, which the Complaint alleges is a prohibited/excessive, in-kind contribution.

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
1050 FIRST STREET N.E., WASHINGTON, DC 20463  
TELEPHONE: 202.694.1661 FAX: 202.219.0613  
EMAIL: KROCHE@FEC.GOV

In a response dated December 12, 2018, the Respondents indicate that they were unaware that the "FEC forbade the use of non-commercial aircraft by congressional candidates." Further, the Respondents admit that they are "fully accountable for the campaign" and any errors that occurred while Mr. Brill was both candidate and treasurer, due to staff turnover.

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 900**. 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

Director

Alternative Dispute Resolution Office

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