



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

April 2, 2019

Geeta McMillan, Treasurer  
Tennessee Democratic Party  
1900 Church St, Suite 203  
Nashville, TN 37203

Re: ADR 907 (AR 17-23)  
Tennessee Democratic Party and Geeta McMillan, Treasurer

Dear Geeta McMillan:

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 Audit Division was based on a review of reports filed by Tennessee Democratic Party 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 Tennessee Democratic Party and Geeta McMillan, 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 Audit Division referred Respondents for receipt of one contribution totaling \$15,000 from an apparent prohibited source. The contribution was from a corporation; Audit staff verified the corporate status with the Virginia Secretary of State.

This matter was discussed at the exit conference with the Audit Division. In response, representatives for the Respondents provided no comments.

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

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 907**. 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