



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 10, 2020

Edward Nordberg, Treasurer  
Friends of John Delaney  
PO Box 70835  
Bethesda, MD 20813

**Response Due Date**  
**August 2, 2020**

Re: ADR 968 (RAD 20L-10)  
Friends of John Delaney and Edward Nordberg, Treasurer (C00508416)

Dear Edward Nordberg:

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 (RAD) was based on a review of reports filed by Friends of John Delaney 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 Friends of John Delaney and Edward Nordberg, 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 Friends of John Delaney and Edward P. Nordberg, Jr., Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2019 Year-End Report, originally filed on January 31, 2020. On February 20, 2020, the

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
1050 FIRST STREET N.E., WASHINGTON, DC 20463  
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Committee filed an Amended 2019 Year-End Report including \$428,570 in additional receipts and \$428,570 in additional disbursements.

In a statement included on the Amended 2019 Year-End Report, filed February 20, 2020, the Committee stated that the in-kind contribution was inadvertently omitted from the original report due to a clerical error.

On the 2020 February Monthly Report, filed February 20, 2020, the Committee reported an offset of \$125,802.25 for a refund "of previous over charge." In a subsequent Form 99 (Miscellaneous Electronic Submission), filed on March 2, 2020, the Committee stated that the offset disclosed on the 2020 February Monthly Report was a refund for an overpayment related to the in-kind contribution from the candidate reported on the Amended 2019 Year-End Report.

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 968**. 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,



Joshua A. Rebollozo  
ADR Specialist  
Alternative Dispute Resolution Office