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By Office of the Commission Secretary at 12:01 pm, Apr 12, 2021

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

April 12, 2021

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Informational Memo on Assignment  
ADR 1004 - Van Drew for Congress (C00661868)  
and Bradley T. Crate, Treasurer

The Audit Division referred A19-04 for processing on April 1, 2021, and the ADR Office designated the referral ADR 1004. This office intends to notify Respondents after five business days. If you have any questions or concerns, please contact the ADR Office.

**Summary of Case:** The Audit Division referred Van Drew for Congress and Bradley T. Crate, Treasurer (Respondents or the Committee) for two (2) findings detailed in the Final Audit Report of the Commission, as approved on March 8, 2021. The findings state that the Committee received excessive contributions from individuals totaling \$45,600 and received prohibited receipts totaling \$13,255 during the 2018 election cycle.

In response to the audit, the Committee materially resolved the excessive and prohibited contributions, albeit untimely.

Memo on Assignment  
ADR 1004 (AD A19-04)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 22, 2021

Bradley T. Crate, Treasurer  
Van Drew for Congress  
C/o Red Curve Solutions  
138 Conant Street, 2nd Floor  
Beverly, MA 01915

**Response Due Date  
May 13, 2021**

Re: ADR 1004 (AD A19-04)  
Van Drew for Congress and Bradley T. Crate, Treasurer (C00661868)

Dear Bradley T. Crate:

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 Van Drew for Congress 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 Van Drew for Congress and Bradley T. Crate, 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 Van Drew for Congress and Bradley T. Crate, Treasurer (Respondents or the Committee) for two (2) findings detailed in the Final Audit Report of the Commission, as approved on March 8, 2021. The findings state that the Committee received excessive contributions from

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
1050 FIRST STREET N.E., WASHINGTON, DC 20463  
TELEPHONE: (202) 694-1152  
EMAIL: [RMARSHALL@FEC.GOV](mailto:RMARSHALL@FEC.GOV)

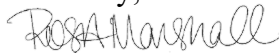
individuals totaling \$45,600 and received prohibited receipts totaling \$13,255 during the 2018 election cycle.

In response to the audit, the Committee materially resolved the excessive and prohibited contributions, albeit untimely.

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 1004**. 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,



Rosa Marshall

Assistant Director

Alternative Dispute Resolution Office