



FEDERAL ELECTION COMMISSION
Washington, DC 20463

April 14, 2015

Rachelle Marks, Treasurer
Friends of Edwin W. Edwards
435 Roy Road
Arnaudville, LA 70512

Re: ADR 751 & ADR 753 (MUR 6833 and P-MUR 573)
Friends of Edwin W. Edwards, Rachelle Marks, Treasurer

Dear Ms. Marks:

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 Bryan Jeansonne which alleges a violation of the Federal Election Campaign Act of 1971, as amended by Friends of Edwin W. Edwards.

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 Edwin W. Edwards, Rachelle Marks, Treasurer, and Trina Scott Edwards (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 May 19, 2014, Bryan Jeansonne filed a complaint against Friends of Edwin W. Edwards and Rachelle Marks, Treasurer (Respondents or the Committee) for failing to include a "paid for" disclaimer and applicable contribution limits on a fundraiser invitation, which was distributed by the candidate's wife via Facebook.

In response to the allegations, the Committee filed a *sua sponte* submission on May 20, 2014, indicating that supporters outside the campaign hosted a fundraiser and prepared and distributed the invitation. The invitation included the contribution limits, but failed to include a "paid for" disclaimer. The Committee states that the invitation was publicized on Facebook by the candidate's wife and the campaign, but the screenshot of the invitation cropped out the contribution limits. Respondents assert that when they became aware of the violations, they removed the posts and posted notice of the error on the campaign's website and Facebook page. The Committee also indicates that it implemented new procedures to ensure errors of this nature do not occur in the future, including routing all proposed invitations (both internally and externally prepared) through the accounting firm to confirm compliance with federal laws prior to dissemination.

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 of receipt 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 751 and ADR 753**. 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
Assistant Director
Alternative Dispute Resolution Office

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