



Federal Election Commission
Washington, DC 20463

October 21, 2015

Felix Guillot
3800 Prescott Road
Alexandria, LA 71301

Re: ADR 757
Clyde Holloway for Congress and Felix Guillot, Treasurer

Dear Mr. Guillot:

Enclosed is the signed copy of the Negotiated Settlement resolving the referral initiated on April 23, 2015, by the Federal Election Commission ("FEC/Commission") involving the above-shown Respondents. The Negotiated Settlement was approved by the Commission on October 19, 2015— the effective date of the agreement.

Note the specific time frames for compliance in Paragraphs 6 and 7 of the agreement. Please forward to this office, a statement confirming Respondent's compliance with the terms listed in the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR caption and case number. In the event a penalty becomes due, the civil penalty payment should be sent to the attention of the Accounting/Finance Office of the FEC.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

This agreement resolves the matter that was initiated by the Commission pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities regarding violations of federal election campaign laws. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,



Krista J. Roche
Assistant Director
Alternative Dispute Resolution Office

Enc: Negotiated Settlement

cc: Gwendolyn Holmes, Finance and Accounting Office



Federal Election Commission
Washington, DC 20463

Case Number: ADR 757

Source: RAD 15L-11

Case Name: Friends of Clyde Holloway for Congress

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Felix Guillot representing Friends of Clyde Holloway for Congress and himself, in his official capacity as Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

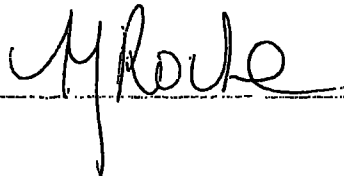
Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Reports Analysis Division (RAD) referred Respondents for failing to disclose all financial activity. The Committee filed an amended 2013 Year-End Report on November 21, 2014, disclosing additional disbursements of \$174,733.96 that were not listed on the original report filed on January 31, 2014.
4. Treasurers of political committees are required to report all financial activity, including all disbursements, pursuant to the FECA. 52 U.S.C. §§ 30104(a)(1), 30104(b)(4), 11 C.F.R. §§ 104.1, 104.3(b)
5. Respondents indicate that inexperience of the report preparer led to the omissions on the 2013 Year-End Report. Respondents indicate they retained a new treasurer who conducted an internal review and filed amendments to correct previously-filed reports.

6. Respondents, in an effort to avoid similar errors in the future, agree to: certify that a representative of the Committee participated in an FEC conference, webinar, or other program developed in consultation with the FEC's Information Division within twelve (12) months of the effective date of this agreement.
7. Respondents acknowledge that a civil penalty of \$3,750 would be appropriate under the circumstances of this matter. The Respondents, however, indicate that financial hardship prevents them from paying any civil penalty, and have submitted extensive financial documentation in support of this claim. These submissions and representations are material representations, and attested to in the agreement. Due to the mitigating circumstances, which include Respondents' financial condition, it is requested the Commission depart from the civil penalty that the Commission would normally otherwise seek for the violations at issue, and assess no civil penalty.
- Respondents understand that if evidence is discovered indicating that Respondents' financial condition is not as stated a civil penalty of up to \$3,750 shall be immediately due.
 - If the Committee receives funds at any point prior to terminating its reporting obligations with the Commission, it shall disburse those funds for payment (in part or in full) of the \$3,750 civil penalty in this matter prior to making any other disbursement, including the repayment of any loan.
8. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
9. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
10. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraphs 6 and 7 above, and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
11. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 757 (RAD 15L-11), and resolves those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

Krista J. Roche, Assistant Director
Alternative Dispute Resolution Office





Date Signed

FOR THE RESPONDENTS:



Felix Guillot

Representing Friends of Clyde Holloway for
Congress and Felix Guillot, Treasurer



Date Signed