



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

December 16, 2016

Seymour Hundley, Treasurer  
Kumar for Congress  
2450 Walton Boulevard  
Rochester Hills, MI 48309

Re: ADR 818 (RAD 16L-22)  
Kumar for Congress and Seymour Hundley, Treasurer

Dear Mr. Seymour:

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 Kumar 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 Kumar for Congress and Seymour Hundley, 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 concludes 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:

SUMMARY: RAD referred Kumar for Congress and Seymour Hundley, Treasurer (Respondents or the Committee) for failing to disclose all financial transactions on its 2014 October Quarterly Report. Respondents filed their original 2014 October Quarterly Report on January 20, 2015. Respondents then filed Amended 2014 October Quarterly

Reports on March 29, 2016 and May 5, 2016 that disclosed additional disbursements totaling \$180,828.04.

In addition, the Committee received \$41,201 in 2014 General Election contributions that were not refunded within the permissible timeframe following the candidate's loss in the 2014 Primary Election. The Committee received 2014 General Election contributions from nineteen (19) individuals that were not refunded within the permissible timeframe following the 2014 Primary Election on August 5, 2014. The \$41,201 in General Election contributions, first disclosed on the 2013 October Quarterly, 2013 Year-End and the 2014 April Quarterly Reports, were fully remedied by May 9, 2016.

The Committee contends that the errors and omissions in the 2014 election cycle reports were due to inexperience. Respondents contend that they hired individuals experienced in campaign finance and following an extensive review, amended reports were filed to correct the record.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondents would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Participate in 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 818. 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,

Lynn M. Fraser, Director  
Alternative Dispute Resolution Office  
202-694-1665