



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 24, 2021

Natalie Baur, Treasurer
Friends of Dave Joyce
9856 Archer Lane
Dublin, OH 43017

**Response Due Date
March 17, 2021**

Re: ADR 990 (P-MUR 623)
Friends of Dave Joyce and Natalie Baur, Treasurer (C00527457)

Dear Natalie Baur:

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 (P-MUR 623) was based on a *sua sponte* submission filed by Friends of Dave Joyce, which reflects 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 Dave Joyce and Natalie Baur, 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:

Respondents filed a *sua sponte* submission dated February 15, 2019, to disclose that the former treasurer, Scott Coleman, embezzled \$174,952.40 from the Committee between January 1, 2015, and November 30, 2018. In the submission, the Committee

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acknowledges that Coleman's embezzlement and concealment caused it to file disclosure reports that did not accurately reflect its receipts, disbursements and cash-on-hand balances. The Committee also acknowledges that Coleman's embezzlement was made possible by the Committee's failure to institute proper internal controls that would have prevented the fraud.

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 990**. 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