

**KENTUCKY REGISTRY OF ELECTION FINANCE
CASE NO. 2011-191**

In re: The Sullivan University System, Inc., Alva Ray Sullivan, Registered Agent; A.R. Sullivan, individually and as Chancellor of Sullivan University; and Jim Crick, individually and as Vice-President for Enrollment Management, Sullivan University

ORDER

This case came before the Kentucky Registry of Election Finance (Registry) at its March 23, 2016 regular meeting, pursuant to Staff Report and Recommendations (Staff Report) issued on February 19, 2016. Respondents, The Sullivan University System, Inc. (Sullivan, Inc.) and Jim Crick (Crick), by counsel, responded to the Staff Report. Following receipt of this response, a Supplemental Staff Report and Recommendations (Supplemental Staff Report) was issued.

The Registry did not request any Respondent to appear at the meeting to present additional information. However, Grover C. Potts, Jr., counsel of record for Sullivan, Inc. and Crick, appeared before the Registry. The proceeding was transcribed and is authorized by KRS Chapter 121.

Having considered the Supplemental Staff Report, Respondents having received notice, and being otherwise duly advised, **IT IS HEREBY ORDERED** that the facts, legal analysis, and recommendations as set forth in the Supplemental Staff Report, are approved and adopted in part as set forth below, consistent with the Registry's action at its March 23, 2016 regular meeting.

Based on the record in this case, the Registry hereby **DISMISSES** the alleged violations of KRS 121.025, KRS 121.035, and KRS 121.310 by Sullivan, Inc. and Alva Ray Sullivan,

individually and as Chancellor of Sullivan, Inc. The Registry further **DISMISSES** the alleged violation of KRS 121.025 and KRS 121.310 by Crick.

However, the Registry **FINDS PROBABLE CAUSE** to believe that Crick unintentionally violated KRS 121.035(2), by utilizing the Sullivan, Inc. training summit held on August 2-3, 2011 to launch a corporate sponsored fundraising effort for the P'Pool campaign in which Crick solicited and received contributions from Sullivan, Inc. employees in the workplace to be delivered to the P'Pool campaign by Crick on behalf of Sullivan Inc.

In finding the above-referenced non-knowing, unintentional violation, the Registry expressly rejects the General Counsel's recommendations to find probable cause to believe that Crick violated KRS 121.025 and Sullivan, Inc. violated KRS 121.025 and KRS 121.035(2).

THEREFORE, THE REGISTRY ORDERS the above-referenced violation by Crick to be referred to the Executive Director and General Counsel to begin conciliation proceedings.

This 14th day of April, 2016.

KENTUCKY REGISTRY OF ELECTION FINANCE
140 Walnut Street
Frankfort, Kentucky 40601
(502) 573-2226



CRAIG C. DILGER, CHAIRMAN

CERTIFICATE OF SERVICE

This is to certify that an accurate copy of the foregoing Order was served by U.S. Mail, first class, postage prepaid, upon Respondents at the following address:

Hon. Grover C. Potts, Jr.
Wyatt, Tarrant & Combs, LLP
500 West Jefferson Street, Suite 2800
Louisville, Kentucky 40202-2898
Counsel for Respondents

With Copy by U.S. Mail, First Class, postage prepaid to Complainant:

Kayla Porter
998 Heritage Way
Greenville, Indiana 47124
Complainant

on this 8th day of June, 2016.



Emily Dennis
General Counsel