



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 9, 2021

William T. Creeden, Treasurer  
International Brotherhood of Boilermakers  
Campaign Assistance Fund  
753 State Ave, Suite 565  
Kansas City, KS 66101

**Response Due Date**  
**April 30, 2021**

Re: ADR 1000 (RAD 21L-08)  
International Brotherhood of Boilermakers Campaign Assistance Fund  
and William T. Creeden, Treasurer

Dear Mr. Creeden:

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 was based on a review of reports filed by International Brotherhood of Boilermakers Campaign Assistance Fund, 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 International Brotherhood of Boilermakers Campaign Assistance Fund and William T. Creeden, 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:

The Reports Analysis Division (RAD) referred International Brotherhood of Boilermakers Campaign Assistance Fund and William T. Creeden, Treasurer (Respondents or the

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
1050 FIRST STREET N.E., WASHINGTON, DC 20463  
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Committee) for failing to disclose all financial activity on its 2020 August Monthly Report, originally filed on August 18, 2020. On November 25, 2020, the Committee filed an Amended 2020 August Monthly Report including \$159,492.93 in additional receipts.

In Form 99s (Miscellaneous Electronic Submissions) filed on February 19, 2021 and March 4, 2021, the Committee states that their offices were unexpectedly closed and they were unable to collect data necessary to file the report due to the COVID-19 virus. The Respondent states that amendments were filed as soon as they were able to retrieve the data and verify information.

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 1000**. 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