



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 27, 2021

Gary Dickey, Esq.  
301 East Walnut Street, Suite 1  
DesMoines, Iowa 50309

**Response Due Date**  
**May 18, 2021**

Re: ADR 1013 (MUR 7405)  
Iowans for a Progressive Tomorrow

Dear Mr. Dickey:

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 was based on a complaint filed by Jon Neiderbach which alleges a violation of the Federal Election Campaign Act of 1971, as amended, by Iowans for a Progressive Tommrow

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 Iowans for a Progressive Tomorrow (Respondent). 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 Respondent decides 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:

On June 5, 2018, the Federal Election Commission (the FEC or Commission) received a Complaint filed by Jon Neiderbach alleging that Iowans for a Progressive Tomorrow, Inc. (Respondent), an Iowa non-profit organization, made an independent expenditure in support of a Congressional candidate, but failed to file a 24-Hour Report with the

Commission and failed to register and report as a political committee "despite obviously attempting to influence an election for federal office."

In a response dated June 18, 2018, the Respondent states that it filed three 24-Hour Reports on May 31, 2018.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent 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 1013**. 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,



Krista J. Roche  
Director  
Alternative Dispute Resolution Office