

# DICKEY | CAMPBELL | SAHAG

## LAW FIRM P.L.C.



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**BY EMAIL ONLY TO:** kroche@fec.gov

Krista Roche  
Federal Elections Commission  
Alternative Dispute Resolution Office  
1050 First Street N.E.  
Washington, DC 20463

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

Dear Ms. Roche:

I write to follow up our discussion concerning resolution of the above-referenced matter. You asked for our position concerning alternative dispute resolution of the two issues asserted in the complaint. With respect to the untimely disclosure of independent expenditures, Iowans for a Progressive Tomorrow acknowledges that a penalty is warranted but requests a reduction from the applicable guideline based on the mitigating factors identified in our conversation:

- Inadvertent misapplication of the 20-day independent expenditure requirement to the group's activities, which involved both state and federal electioneering activities;
- The delayed reporting nonetheless occurred six days prior to the election date; and
- The organization and its principals no longer engage in federal election activities so there is no likelihood of future noncompliance.

As to the second issue, the nomination or election of federal candidates was not the major purpose of the organization, and therefore, it was not a political committee.

Please let me know if you need additional information concerning this matter.

Sincerely,



Gary Dickey