



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 7, 2021

Edwin R. Ferris, Treasurer  
International Longshore and Warehouse Union  
-- Political Action Fund  
1188 Franklin Street  
San Francisco, CA 94109

**Response Due Date  
June 25, 2021**

Re: ADR 1028 (RAD 21L-34)  
International Longshore and Warehouse Union -- Political Action Fund  
and Edwin R. Ferris, Treasurer (C00176214)

Dear Treasurer:

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 (RAD) was based on a review of reports filed by International Longshore and Warehouse Union -- Political Action 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 Longshore and Warehouse Union -- Political Action Fund and Edwin R. Ferris, 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 Longshore and Warehouse Union -- Political Action Fund and Edwin R. Ferris, Treasurer (Respondents or the

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
1050 FIRST STREET N.E., WASHINGTON, DC 20463  
TELEPHONE: (202) 694-1152  
EMAIL: [RMARSHALL@FEC.GOV](mailto:RMARSHALL@FEC.GOV)

Committee) for failing to timely file one (1) 24-Hour Report totaling \$31,989.48 to support one (1) independent expenditure disclosed on the 2020 30-Day Post-General Report.

On February 10, 2021, the Committee filed the 24-Hour Report, albeit untimely. In a Form 99 (Miscellaneous Electronic Submission) filed on February 19, 2021, the Committee states that the failure to file the 48-Hour Report was inadvertent and that they have since implemented new processes which include improving training for staff, improving internal checklists, and review processes.

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 1028**. 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,

A handwritten signature in black ink that reads "Rosa Marshall". The signature is fluid and cursive, with the first name "Rosa" and last name "Marshall" clearly distinguishable.

Rosa Marshall  
Assistant Director  
Alternative Dispute Resolution Office