



**OAKLAND OFFICE**  
1999 Harrison Street, Suite 2700  
Oakland, CA 94612  
Tel: (510) 272-0169  
Fax: (510) 272-0174  
[www.leonardcarder.com](http://www.leonardcarder.com)

File No. 592-38

June 22, 2021

Via U.S. Mail and email [rmarshall@fec.gov](mailto:rmarshall@fec.gov)

Rosa Marshall, Assistant Director  
Federal Election Commission  
Alternative Dispute Resolution Office  
1050 First Street, N.E.  
Washington, DC 20463

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

Dear Ms. Marshall,

Enclosed is the signed Commitment to Participate in ADR and Statement of Designation  
of Representative/Counsel.

Sincerely,

A handwritten signature in blue ink, appearing to be "Arthur Liou", written over a horizontal line.

Leonard Carder, LLP  
Arthur Liou, Attorney  
ILWU Representative for ILWU-Political  
Action Fund and Edwin R Ferris, Treasurer

Enclosure

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# COMMITMENT TO PARTICIPATE IN ADR

ADR # 1028

I confirm that I read the material describing the Federal Election Commission's (FEC) Alternative Dispute Resolution (ADR) program and request that my case be considered for this program. I agree to the following conditions:

1. To engage in the FEC's ADR process;
2. To participate in good faith in negotiations to resolve the case, and, if unsuccessful, to engage in mediation with the aim of achieving a mutually acceptable resolution; and
3. All parties and their representatives or counsel agree that all proceedings during negotiations to resolve the matter, including any statements made or documents prepared by any party, attorney or representative, may not be disclosed for any purpose; and
4. To toll the statute of limitations for any civil enforcement action that the FEC might bring in my case pursuant to 2 U.S.C. § 437g(a)(6) for the same number of days my case is being processed in the Commission's ADR Program; and
5. To designate the representative named below to receive all communications from the FEC on behalf of Respondents in this case and to authorize the named representative to participate in the FEC's ADR program on behalf of Respondents, including negotiating on behalf of Respondents with the full authority to make and/or accept settlement offers and legally bind Respondents upon the execution of a written agreement formalizing the settlement of this case.

NAME OF RESPONDENT:

International Longshore and Warehouse Union -- Political Action Fund and Edwin R. Ferris, Treasurer

ADDRESS:

1188 Franklin Street, 4th Floor

San Francisco, CA 94109

TELEPHONE:

415-775-0533

EMAIL ADDRESS:

fec@ilwu.org

## STATEMENT OF DESIGNATION OF REPRESENTATIVE/COUNSEL

NAME OF REPRESENTATIVE/COUNSEL:

Arthur Liou, Elizabeth Gropman

FIRM NAME:

Leonard Carder, LLP

ADDRESS:

1999 Harrison Street, Suite 2700

Oakland CA 94612

TELEPHONE:

510-272-0169

EMAIL ADDRESS:

aliou@leonardcarder.com, egropman@leonardcarder.com

6/22/21

DATE

SIGNATURE OF RESPONDENT