



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 2021

Lisa Maloy, Treasurer
American Crystal Sugar Company Political Action Committee
101 North 3rd Street
Moorhead, MN 56560

**Response Due Date
November 19, 2021**

Re: ADR 1047 (RR 21L-32)
American Crystal Sugar Company Political Action Committee and Lisa Maloy, Treasurer
(C00110338)

Dear Lisa Maloy:

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 review of reports filed by American Crystal Sugar Company Political Action Committee 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 American Crystal Sugar Company Political Action Committee and Lisa Maloy, 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 American Crystal Sugar Company Political Action Committee and Lisa Maloy, Treasurer (Respondents or the Committee) for failing to remedy impermissible

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE
1050 FIRST STREET N.E., WASHINGTON, DC 20463
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Primary 2020 contributions totaling \$45,000, within the permissible timeframe. The Committee has redesignated or refunded all of these contributions outside of the permissible timeframe.

The Committee filed a Form 99 (Miscellaneous Electronic Submission) on September 21, 2020 detailing the Committee's efforts to remedy the impermissible contributions. In addition, the Committee filed amendments to their 2020 June Monthly, 2020 July Monthly, and 2020 October Monthly Reports to disclose refunds and updated election designation information to address the remaining impermissible contributions.

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.

This matter has been designated as **ADR 1047**. 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