



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 25, 2022

Denelle Robinson, Treasurer  
WOMEN VOTE!  
1800 M St NW, Ste 375N  
Washington, DC 20036

**Response Due Date  
April 18, 2022**

Re: ADR 1076 (RAD 21L-22)  
WOMEN VOTE! and Denelle Robinson, Treasurer (C00473918)

Dear Denelle Robinson:

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 WOMEN VOTE! 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 WOMEN VOTE! and Denelle Robinson, 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:

RAD referred WOMEN VOTE! And Denelle Robinson, Treasurer (Respondents or the Committee) for failing to timely file one (1) 48-Hour Report totaling \$170,146 to support one (1) independent expenditure disclosed in the 2020 October Monthly Report, and for failing to timely file one (1) 24-Hour Report totaling \$57,220.38 to support two (2)

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
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independent expenditures disclose on the 2021 May Monthly Report. Both reports were filed, albeit untimely.

On February 25, 2021, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that a payment ultimately disclosed on the 2020 October Monthly Report was inadvertently omitted from the 48-Hour Report at issue. On July 28, 2021, the Committee filed a Form 99 stating that an invoice was inadvertently omitted from the relevant 24-Hour Report. The Committee further stated that these were oversights despite numerous checks and balances in place.

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 1076**. 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, appearing to read "K. Roche", with a stylized flourish at the end.

Krista J. Roche  
Director  
Alternative Dispute Resolution Office