



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 5, 2022

Daniel Barkhuff, Treasurer
Veterans for Responsible Leadership
P.O. Box 9219
South Burlington, VT 05407

Response Due Date
July 27, 2022

Re: ADR 1080 (RAD 22L-15)
Veterans for Responsible Leadership and Daniel Barkhuff, Treasurer (C00648808)

Dear Daniel Barkhuff:

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 Veterans for Responsible Leadership 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 Veterans for Responsible Leadership and Daniel Barkhuff, 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 Veterans for Responsible Leadership and Daniel Barkhuff, Treasurer (Respondents or the Committee) for failing to timely file six (6) 24-Hour Reports totaling \$146,390.60 to support thirty (30) independent expenditures disclosed on the 2020 30-

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Day Post-General Report. On December 4, 2020, the Committee filed one (1) 24-Hour Report to support these independent expenditures, albeit untimely.

In a Form 99 (Miscellaneous Electronic Submission) filed on April 14, 2021, the Committee stated that the report was not timely filed because the personnel preparing the report were not made aware of the expenditures until after the 24-Hour reporting period had expired. Further, the Committee states it reported the independent expenditures immediately upon discovery of its failure to disclose them.

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 1080**. 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,



Joshua A. Rebollozo
Assistant Director
Alternative Dispute Resolution Office