



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 27, 2022

Robert Piaro, Treasurer
Association for Emergency Responders and Firefighters, PAC
8444 County Road M
Fredonia, WI 53021

Response Due Date
October 7, 2022

Re: ADR 1085 (AD A19-21)
Association for Emergency Responders and Firefighters, PAC and Robert Piaro,
Treasurer (C00622472)

Dear Robert Piaro:

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 Audit Division was based on a review of reports filed by Association for Emergency Responders and Firefighters, PAC which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

An email was sent to your office on August 31, 2022, regarding an opportunity to participate in the ADR program at the Commission to resolve this matter. To date, the Commission has received no response. 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 Association for Emergency Responders and Firefighters, PAC and Robert Piaro, 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 Audit Division referred Association for Emergency Responders and Firefighters, PAC and Robert Piaro, Treasurer (Respondents or the Committee) for one (1) finding detailed in the Final Audit Report of the Commission, as approved on July 28, 2022. The finding states that the Committee failed to disclose disbursements totaling \$769,804. The Committee filed amended reports disclosing the activity at issue, albeit untimely.

In response to the audit, the Committee stated that it continues to follow and refine its processes and procedures. To avoid similar errors in the future, the Committee has improved communication and document sharing with its accounting firm and added a function to its filing software to detect discrepancies between reports and bank statements.

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 by October 7, 2022 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 1085**. 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