



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 30, 2023

Lisa Lisker, Treasurer
Steve Daines for Montana
228 S. Washington Street, Suite 115
Alexandria, VA 22314

Response Due Date
December 21, 2023

Re: ADR 1150 (AD A21-04)
Steve Daines for Montana and Lisa Lisker, Treasurer (C00491357)

Dear Lisa Lisker:

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 Steve Daines for Montana 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 Steve Daines for Montana and Lisa Lisker, 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 Steve Daines for Montana and Lisa Lisker, Treasurer, (Respondents or the Committee) for one (1) finding detailed in the Final Audit Report of the Commission, as approved on November 1, 2023. The finding states that the Committee failed to disclose receipts, including contributions from individuals, political

committees, conduit transfers, and joint fundraising activity, totaling \$945,418 during calendar years 2019 and 2020.

In response to the Draft Final Audit Report, the Committee filed amended reports for the 2020 election cycle, however, the amended reports did not materially correct the public record. In particular, the amended reports corrected most of the disclosure errors for the political committees, joint fundraising activity, and the conduit transfers, however, nearly all of the identified errors for contributions from individuals remained inaccurately disclosed.

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 1150**. 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