



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 5, 2024

Todd C. Hagopian, Treasurer
Libertarian National Committee, Inc.

Response Due Date
January 26, 2023

Re: ADR 1153 (MUR 8180)
Libertarian National Committee, Inc. and Todd C. Hagopian, Treasurer (C00255695)

Dear Todd C. Hagopian:

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 complaint filed by Jeremy David Kantorowicz which alleges a violation of the Federal Election Campaign Act of 1971, as amended, by Libertarian National Committee, Inc..

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 Libertarian National Committee, Inc. and Todd C. Hagopian, 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:

On October 10, 2023, Jeremy David Kantorowicz filed a Complaint alleging that Libertarian National Committee, Inc. and Todd C. Hagopian, Treasurer (Respondents or the Committee) failed to report transactions billed to the Committee's credit card as memo entries totaling a combined \$38,240.16 on

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE
1050 FIRST STREET N.E., WASHINGTON, DC 20463
TELEPHONE:
TELEPHONE: (202) 694-1152
EMAIL: RMARSHALL@FEC.GOV

its 2023 July Monthly, 2023 August Monthly, and 2023 September Monthly Reports.

In a response dated November 1, 2023, Respondents state that the credit card disclosures on the reports listed in the Complaint are related to debts, which do not require the Committee to disclose the ultimate payee information when disclosing debts on Schedule D. Respondents contend that the ultimate payees will be disclosed on Schedule B when the outstanding debts are paid and intend to return to the practice of paying its credit cards in full every month, to prevent future confusion related to the disclosure of debt and ultimate payees.

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 1153**. 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,



Rosa Marshall
Assistant Director
Alternative Dispute Resolution Office