



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

October 30, 2024

Eric Jeng, Treasurer
One APIA PAC
6675 S. Tenaya Way
Las Vegas, NV 89113

**Response Due Date
November 21, 2024**

Re: ADR 1189 (RAD 24L-39)
One APIA PAC and Eric Jeng, Treasurer (C00761072)

Dear Eric Jeng:

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 One APIA PAC 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 One APIA PAC and Eric Jeng, 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 Reports Analysis Division (RAD) referred One APIA PAC and Eric Jeng, Treasurer (Respondents or the Committee) for failing to timely file three (3) 24-Hour Reports to support nine (9) independent expenditures totaling \$126,893.35, disclosed on the 2020 Year-End Report, received February 26, 2024, and two (2) 24-Hour Reports to support five (5) independent expenditures totaling \$92,424.56 disclosed on the Amended 2022 Year-End Report, received February 27, 2024. On

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

November 16, 2020, the Committee filed one (1) 24-Hour Report to support six (6) of these independent expenditures. On August 23, 2024, the Committee filed eight (8) 24-Hour Reports to support the remaining expenditures.

On May 21, 2024, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating in part that, "The PAC recognizes that a total of \$42,424.56 for the 2022 cycle and \$43,523.18 for the 2020 cycle should have appeared in timely 24-hour reports but did not. The PAC asks the Commission to pardon the discrepancy in light of the PAC's ongoing, good faith efforts timely to and fully to comply.

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 1189**. 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

Rosa Marshall
Assistant Director
Alternative Dispute Resolution Office