



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

November 26, 2024

Anthony LaBruna, Treasurer  
American Principles Project PAC  
2800 Shirlington Road  
Arlington, VA 22206

**Response Due Date  
December 17, 2024**

Re: ADR 1195 (RAD 24L-46)  
American Principles Project PAC and Anthony LaBruna, Treasurer (C00544387)

Dear Anthony LaBruna:

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 American Principles Project 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 American Principles Project PAC and Anthony LaBruna, 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 American Principles Project PAC and Anthony LaBruna, Treasurer (Respondents or the Committee) for failing to disclose all activity on its 2024 April Quarterly Report. On July 13,

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
1050 FIRST STREET N.E., WASHINGTON, D.C.  
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EMAIL: [RMARSHALL@FEC.GOV](mailto:RMARSHALL@FEC.GOV)


2024, the Committee filed an Amended 2024 April Quarterly Report which disclosed \$178,262.12 in additional in-kind receipts.

On September 24, 2024, the Committee filed a Form 99 (Miscellaneous Electronic Submission), stating in part, "(t)he report was amended to disclose an in-kind contribution received by the committee in the form of office and overhead expenses pertaining to 2023. These expenses were not disclosed on the initial April Quarterly filing because they were unknown at the time of filing and had not been calculated."

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 1195**. 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