



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

April 10, 2025

Joseph Vanderhulst  
Langdon Law LLC  
1201 Main Street, Suite 2  
Cincinnati, OH 45202

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

Dear Mr. Vanderhulst:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on April 9, 2025 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the settlement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is attached below.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

Rosa Marshall  
Alternative Dispute Resolution Office

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

Enc: Payment Instructions  
Compliance Chart  
Negotiated Settlement

### ADR 1195 Compliance Chart

Type	Date Due
Develop and certify implementation of procedures to ensure that in-kind contributions are timely tracked and reported	5/12/2025
certify that a representative of the Committee participated in an FEC conference, webinar, or other training program developed in consultation with the FEC's Information Division	4/9/2026



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Case Number: ADR 1195

Source: RAD 24L-46

Case Name: American Principles Project PAC

## NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (FEC or the Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Joseph Vanderhulst, Esq., representing American Principles Project PAC and Anthony LaBruna, in the official capacity of Treasurer (the Committee or Respondents). It is understood that this settlement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission enters into this settlement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this settlement with the Commission.
3. The Reports Analysis Division (RAD) referred Respondents for failing to disclose all activity on their 2024 April Quarterly Report filed on April 15, 2024. On July 13, 2024, the Committee filed an Amended 2024 April Quarterly Report, which disclosed \$178,262.12 in additional in-kind contributions.
4. Treasurers of political committees are required to report all financial activity, including all receipts and disbursements, pursuant to the FECA. 52 U.S.C. § 30104(a)(1), (b)(2), (b)(4); 11 C.F.R. §§ 104.1, 104.3(a)-(b).
5. The Committee states that the activity pertains to recurring administrative expenses contributed by its parent organization that were incurred during the 2023 calendar year. On March 20, 2025, the Committee updated the public record by removing the \$178,262.12 in-kind contribution from their 2024 April Quarterly Report and amending their 2023 semi-annual reports to more accurately disclose the administrative expenses incurred during each reporting period.

6. Respondents, in an effort to more consistently and accurately disclose recurring administrative expenses in the future, agree to:
  - a. certify that a representative of the Committee participated in an FEC conference, webinar, or other training program developed in consultation with the FEC's Information Division within twelve (12) months of the effective date of this settlement; and
  - b. develop and certify implementation of procedures to ensure that in-kind contributions are timely tracked and reported within thirty (30) days of the effective date of this settlement.
7. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this settlement under penalty of perjury pursuant to 28 U.S.C. § 1746.
8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance. Unpaid civil money penalties are subject to the Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. § 3701 et seq. The Commission will transfer debt to the United States Department of the Treasury (Treasury) for collection.
9. This settlement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this settlement as set forth above and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 1195 (RAD 24L-46), and resolves those issues identified above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

Rosa Marshall, Assistant Director  
Alternative Dispute Resolution Office



4/9/2025

Date Signed

FOR THE RESPONDENTS:

Joseph A. Vanderhulst  
Joseph A. Vanderhulst (Mar 28, 2025 13:55 EDT)

Joseph Vanderhulst, Esq.  
Representing American Principles Project  
PAC and Anthony LaBruna, Treasurer

Mar 28, 2025

Date Signed