



**Federal Election Commission  
Washington, DC 20463**

October 17, 2005

William J. Farah, Esq.  
Oldaker, Biden & Belair, LLP  
818 Connecticut Avenue NW, Suite 1100  
Washington, DC 20006

Re: ADR 277  
Arab American Leadership PAC and James Joseph Zogby, Treasurer

Dear Mr. Farah:

Enclosed is the signed copy of the agreement resolving the referral initiated on June 30, 2005 by the Federal Election Commission ("FEC/Commission") against the Arab American Leadership PAC and James Joseph Zogby, Treasurer ("Respondents"). The agreement for ADR 277 (RR 05L-13) was approved by the Commission on October 14, 2005 – the effective date of the agreement.

Note that paragraph 9 of the agreement specifies that Respondents shall comply with the terms of this settlement within sixty (60) days of the effective date of the agreement for terms (a)-(d). Respondents must comply with term (e) within twelve (12) months of the effective date of this agreement. Please forward to this office, a statement confirming Respondents' compliance with the terms listed in paragraph 6 of the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 6.

As you are aware, the settlement agreement 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 entry into settlement 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 Information Office.

This agreement resolves the matter that was initiated by the Commission pursuant to information ascertained in the normal course of carrying out its supervisory

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responsibilities regarding violations of federal election campaign laws. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

Lynn M. Fraser, Assistant Director  
Alternative Dispute Resolution Office  
202-694-1665

Enclosure: Agreement

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Washington, DC 20463**

Case Number ADR 277

Source RR 05L-13

Case Name Arab American Leadership Council PAC

### **NEGOTIATED SETTLEMENT**

This matter was initiated by the Federal Election Commission ("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 William J. Farah, Esq. representing the Arab American Leadership Council PAC and James Joseph Zogby, Treasurer ("the Committee" or "Respondents"). It is understood that this agreement 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 entered into this agreement 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 authorized in "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 2 U.S.C. § 437g.
2. Respondents voluntarily enter into this agreement with the Commission.
3. The Reports Analysis Division ("RAD") referred Respondents for failing to file a 2002 30 Day Post-General Report and 2002 Year End Report. RAD sent the Committee a Prior Notice on September 30, 2002 that outlined the reporting requirements and filing dates for those quarterly filers who made general election contributions or expenditures. RAD stated that Respondents filed a 2002 Year End Report on February 10, 2005 that covered the filing dates of October 1, 2002 through December 31, 2002. This report included the activity for the 2002 30 Day Post-General Report and the 2002 Year End Report. Based upon itemized disbursements reported on the 2002 Year End Report, Respondents also failed to file a 12 Day Pre-General Report.
4. The FECA requires the treasurer of a political committee to file reports disclosing receipts and disbursements. The statute and regulations specify the reporting periods and timing of disclosure reports. 2 U.S.C. § 434(a), 11 C.F.R. § 104.5(c).

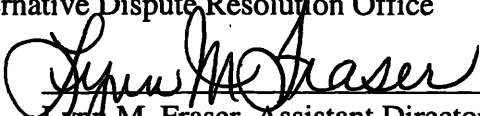
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5. Respondents acknowledge a violation of FECA due to inexperienced staff. The Committee took steps to ensure future compliance by hiring an accountant and enhancing their financial database to interface with reporting software.
6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) file the 2002 12 Day Pre-General, a revised 2002 30 Day Post-General and a revised 2002 Year End Report within sixty (60) days; (b) hire a PAC Administrator/Compliance Specialist within sixty (60) days; (c) develop a compliance manual for reference by Committee staff within sixty (60) days; (d) pay a civil penalty of \$ 4,000 within sixty (60) days; and (e) send a Committee representative to a FEC seminar within twelve (12) months.
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 agreement 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 submit any unpaid civil penalty to the U.S. Treasury for collection or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms (a) through (d) within sixty (60) days from the effective date of this agreement, and term (e) within twelve (12) months from the effective date of this agreement.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 277 (RR 05L-13), and effectively resolves this matter. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

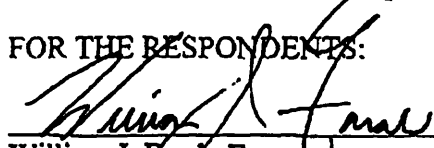
Allan D. Silberman, Director  
Alternative Dispute Resolution Office

By:

  
Lynn M. Fraser, Assistant Director  
Alternative Dispute Resolution Office

10/14/05  
Date Signed

FOR THE RESPONDENTS:

  
William J. Farah, Esq.  
Representing the Arab American Leadership Council PAC and  
James Joseph Zogby, Treasurer

10/06/05  
Date Signed

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FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADR CASE # 277

DATE SCANNED 11/10/05

SCANNER NO. 2

SCAN OPERATOR S.E.G

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