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November 10, 2005

Mr. Allan Silberman
Director, ADR Program
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: ADR 278

Dear Mr. Silberman:

I represent Dollars for Democrats committee and its treasurer Ann Fishman in the above referenced matter. The matter was referred to your office by the Reports Analysis Division for the purpose of resolving an issue related to the committee's failure to include receipts on its 2004 Twelve Day Pre-General Election Report. The committee recognizes that the receipts in question were not included on the original report. The preparer of the report believes that he did properly enter the information. He believes that for some reason either it was not electronically transmitted or it was not received by the Commission. As soon as the omission was discovered, an amended report was filed. For the reasons given below, the committee believes that no further action need be taken in this matter.

First, the committee did not contribute to or make an expenditure on behalf of any candidate during the covered reporting period. Therefore, the committee was not required to submit the report in question. In MURs 4549 and 4558, the Commission found no reason to believe a violation of the law occurred when a committee that did not contribute or make an expenditure on behalf of a candidate failed to file a Twelve Day Pre-General Election Report. *See* 2 USC § 434(a)(4)(A)(ii). Consequently, the omission did not constitute a breach of a reporting obligation of the committee. The committee regrets the omission, but does not believe that any penalty may be imposed

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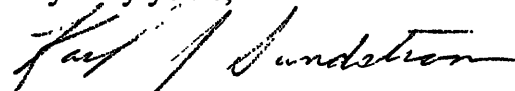
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under these facts or that a penalty is necessary to prevent similar omissions in the future.

Second, the committee has hired an outside vendor that specializes in this area to prepare and submit its reports. This step should reassure the Commission that the committee is committed to complying with the spirit and letter of the law. The committee has reported to the Commission for over two decades and its compliance record is excellent. Its history attests to its commitment to fully and timely comply. The committee is willing to provide, if necessary, the Commission with a description of its internal compliance procedures.

The committee requests that the matter be resolved without any further action.

Very truly yours,


Karl. J. Sandstrom

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