



FEDERAL ELECTION COMMISSION  
999 E Street, N.W.  
Washington, DC 20463

February 1, 2006

Karl J. Sandstrom, Esq.  
Perkins Coie  
607 Fourteenth Street, N.W.  
Washington, D.C. 20005

Re: ADR 278/RAD 05L-24

Dear Mr. Sandstrom:


Enclosed is the signed copy of the agreement between the Federal Election Commission (FEC) and Dollars for Democrats and Ann Fishman, Treasurer, resolving ADR 278/RAD 05L-24. This agreement, which was approved by the Federal Election Commission on January 25, 2006, the effective date of the agreement -- resolves the matter.

As you are aware, the settlement agreement will be made part of the record that is released to the public. In addition, as of January 1, 2004, the Commission also will place on the record copies of the referral from the Reports Analysis Division, correspondence exchanged between your office and this office prior to our entry into settlement negotiations and reports prepared by this office to assist the Commission 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 these matters will be forwarded shortly to the FEC's Public Information Office.

The enclosed agreement effectively resolves the issues raised in the referral, which was the subject of this case.

I appreciate your assistance in resolving this matter and helping to bring this case to a mutually satisfactory conclusion.

Sincerely,

  
Allan D. Silberman,  
Director, ADR Office

Enclosure: a/s

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FEDERAL ELECTION COMMISSION  
Washington, DC 20463

Case Number: ADR 278  
Source: RAD 05L-24  
Case Name: Dollars for Democrats

### **NEGOTIATED SETTLEMENT**

This matter was initiated by the Federal Election Commission ("the Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following a review of the record and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended ("the FECA" or "Act"), and to resolve this matter, the Commission entered into negotiations with Karl J. Sandstrom, Esq. on behalf of Dollar for Democrats and Ann Fishman, Treasurer (the "Respondents" or the "Committee"). 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 have addressed all the issues raised in this matter. The parties have agreed to resolve the matter according to the following terms:

1. The Commission has entered into this agreement as part of its responsibility for administering the Federal Election Campaign Act and in an effort to promote compliance with the FECA on the part of Respondents. The Commission's use of ADR procedures 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. The Respondents have voluntarily entered into this agreement with the Commission.
3. The Reports Analysis Division ("RAD") referred Respondents for amending its 12 Day Pre-General Report to disclose additional receipts totaling \$139,624.37. The Committee's original 2004 12 Day Pre-General Report, filed on October 25, 2004, disclosed \$0 receipts for itemized contributions from individuals/persons other than political committees and for unitemized contributions individuals/persons other than political committees. The amended 12 Day Pre-General Report, filed on December 1, 2004, disclosed \$33,748.00 in receipts for itemized contributions from individuals/persons other than political committees and \$105,876.37 in receipts for unitemized contributions from individuals/persons than political committees. The total amount represented a 100% increase over the amount disclosed on the Committee's original 2004 12 Day Pre-General Report.
4. Treasurers of political committees are required to file reports of receipts and disbursements in accordance with the provisions of the Act and regulations. 2 U.S.C. § 434(a)(1) and 11 C.F.R. § 104.1(a). Each report filed by political committees other than authorized committees of a candidate for Federal office shall disclose the total amount of all receipts,


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including *inter alia*, contributions from persons other than political committees and itemized and unitemized contributions from persons, other than political committees, including contributions from individuals. 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. §§ 104.3(a)(2)(i)(A) and 104.3(a)(2)(i)(B).

5. Respondents acknowledged that the subject receipts were not included in the original 2004 12 Day Pre-General Report and once discovered, they amended the aforementioned Report to disclose additional receipts not previously disclosed. Respondents explained that they did not make contributions or expenditures on behalf of candidates for elective Federal office covered by the aforementioned 12 Day Pre-General Report.
6. Given that the Committee did not make contributions or expenditures on behalf of any candidate for Federal office during the reporting period, there was no requirement that the Committee file the 12 Day Pre-General Report. If they had made such expenditures or contributions Respondents would have been required to file pre-election reports. 2 U.S.C. § 434(a)(4)(A)(ii). However, since the Committee chose to file the subject Report, it would have been preferable if they had included the aforementioned receipts. Given these circumstances, the Commission determined that this matter be dismissed.
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. This agreement will become effective on the date signed by the parties and approved by the Commission.
9. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 278/RAD 05L-24 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.

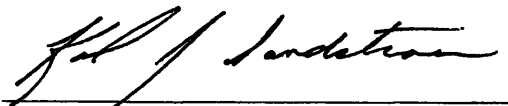
FOR THE COMMISSION:


Allan D. Silberman,  
Director Alternative Dispute Resolution Office

  
\_\_\_\_\_  
Allan D. Silberman

  
\_\_\_\_\_  
Date

FOR THE RESPONDENTS:

  
\_\_\_\_\_  
Karl J. Sandstrom, Esq.  
on behalf of Dollar for Democrats and  
Ann Fishman, Treasurer

  
\_\_\_\_\_  
Date

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