



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

December 7, 2005

John Dougherty, Treasurer  
Int'l. Brotherhood of Electrical Workers Local 98  
Committee on Political Education  
1719 Spring Garden Street  
Philadelphia, PA 19130

Re: ADR 302 (RR 05L-60)  
International Brotherhood of Electrical Workers Local 98 Committee on Political  
Education and John Dougherty, Treasurer

Dear Mr. Dougherty:

The Reports Analysis Division ("RAD") of the Federal Election Commission ("FEC" or "Commission") determined that matters arising from its recent review of reports filed by the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and John Dougherty, Treasurer ("Respondents") warranted further examination for possible violation of the Federal Election Campaign Act of 1971, as amended. The Commission, thereafter, reviewed the file and voted on November 29, 2005 to assign this matter to the FEC's Alternative Dispute Resolution Office ("ADRO") for processing.

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 Respondents. The ADR Program provides Respondents with an opportunity to negotiate, and if necessary, mediate 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 and/or mediation 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 Program, i.e., negotiation and/or mediation, you must: 1) indicate in writing a willingness to have your case submitted to the ADR process; 2) agree to participate in the bilateral negotiations and if necessary, mediation; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
999 E STREET N.W., WASHINGTON, DC 20463  
TELEPHONE: 202.694.1665 FAX: 202.219.0613  
EMAIL: lfraser@fec.gov

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The issues referred to the ADRO and the focus of our subsequent negotiations are summarized as follows:

RAD referred Respondents (or the "Committee") for failing to file one 48-Hour Notice in support of an independent expenditure totaling \$68,284 disclosed on the 2004 12 Day Pre-General Report. In addition, the Committee failed to file one 24-Hour Notice to support three independent expenditures totaling \$56,088.97 disclosed on an Amended 2004 30 Day Post General Report. RAD confirmed that a prior notice listing official filing dates for quarterly filers during the 2004 calendar year was sent to Respondents on September 27, 2004. The notice included a section titled 48 and 24 Hour Reports on Independent Expenditures, explaining when independent expenditures triggered the required 48 or 24 Hour Notices. Respondents contend that they misinterpreted the FECA, and thought their disclosure of independent expenditures on schedule E was sufficient.

If after reviewing this letter and the enclosed brochure, which describes the ADR program, Respondents would like this case selected for ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR Program form. **Failure to respond affirmatively within fifteen (15) business days of receipt 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 and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 302**. 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,

/s/

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

Enclosures: Brochure  
Commitment to Submit Matter to ADR  
Designation of Representative/Counsel