



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 31, 2006

Anthony Pugliese, Treasurer
American Institute of Certified Public
Accountants Political Action Committee
Harborside Financial Center
201 Plaza III
Jersey City, NJ 07311

Dear Mr. Pugliese:

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 American Institute of Certified Public Accountants Political Action Committee and you as Treasurer (the "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 March 20, 2006 to assign this matter to the FEC's Alternative Dispute Resolution (ADR) office 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 the Committee decides to participate in the Program, i.e., negotiation and/or mediation, it should: 1) indicate in writing a willingness to have their 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.

The issues referred to the ADR Office and the focuses of our subsequent negotiations are described as follows:

RAD referred Respondents for amending its 2004 August Monthly, September Monthly and Year End Reports to disclose additional receipts. The original August Monthly Report, filed on August 18, 2004, covering the period from July 1, 2004 through July 31, 2004, disclosed no receipts for Itemized and Unitemized Contributions from Individuals/Persons Other Than Political Committees on the Detailed Summary Page. On March 11, 2005, the Committee disclosed on an Amended 2004 August Monthly Report \$111,828.00 for Itemized and Unitemized Contributions from Individuals/Persons Other Than Political Committees.

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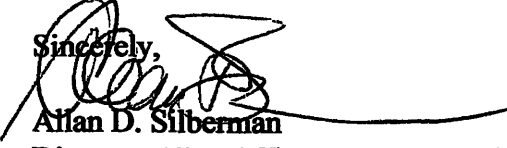
On that same day, the Committee filed an Amended 2004 September Monthly Report disclosing \$81,663.50 for Itemized and Unitemized Contributions from Individuals/Persons Other Than Political Committees. Also on March 11, 2005, the Committee filed an Amended 2004 Year End Report that disclosed \$59,923.10 for Itemized and Unitemized Contributions from Individuals/Persons Other Than Political Committees.

Following receipt of the three RFAs seeking clarification regarding the additional disclosed receipts, Respondents submitted Amended Reports that noted that the additional receipts disclosed on the 2004 Amended August Monthly, September Monthly and Year End Reports were not disclosed on the original reports due to programming issues arising from conversion of Respondents' Legacy systems to an Oracle-based platform.

If after reviewing this letter and the enclosed brochure, which describes the ADR program, the Committee would like the matter processed in ADR, you, as Treasurer, 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, either the case will be sent to the FEC's Office of General Counsel or the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 312/RR 05L-63**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADR Office at 202-694-1670.

Sincerely,


Allan D. Silberman
Director, ADR Office

Enclosures:

1. ADR Brochure
2. ADR Commitment Statement

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