



Federal Election Commission  
Washington, DC 20463

November 25, 2008

Mr. Michael Trister  
1666 Connecticut Avenue, NW  
Washington, DC 20009

Re: ADR 437 (RAD 07L-56)  
Laborers' Political League-Laborers' International Union of N.A. Committee  
and Armand E. Sabitoni, Treasurer

Dear Mr. Trister:

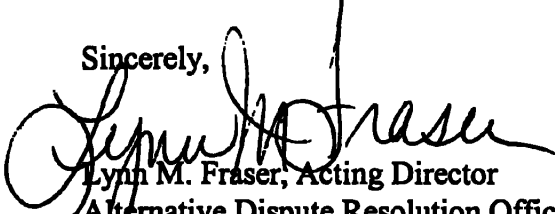
Enclosed is the signed copy of the agreement resolving the referral initiated on December 28, 2007 with the Federal Election Commission ("FEC/Commission") against Laborers' Political League-Laborers' International Union of N.A. Committee and Armand E. Sabitoni, Treasurer ("Respondents"). The agreement for ADR 437 (RAD 07L-56) was approved by the Commission on November 12, 2008 – the effective date of the agreement.

Note the specific time frames for compliance in paragraph 8 of the agreement. Please forward to this office, a statement confirming Respondent's compliance with the terms listed in paragraph 5 of the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 8 and contain the ADR caption and case number. **The civil penalty payment should be sent to the attention of the Accounting/Finance Office of the FEC. The civil penalty under the agreement is due on December 26, 2008. Please put the ADR case number on the civil penalty check as well, to ensure crediting to the correct case.**

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 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 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, Acting Director  
Alternative Dispute Resolution Office  
202-694-1665

Enclosure: Agreement

cc: Angela Dillard, Finance and Accounting Office  
Ken Pezzella, Finance and Accounting Office  
Room 819

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**THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463**

Case Number: ADR 437  
Source: RAD 07L-56  
Case Name: Laborers' Political  
League-Laborers' Int. Union of NA

**NEGOTIATED SETTLEMENT**

This matter was initiated by the Federal Election Commission ("FEC" or "the 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 ("the FECA"), and resolve this matter, the Commission entered into negotiations with Michael Trister, representing Laborers' Political League-Laborers' International Union of N.A and Armand E. Sabitoni, in his official capacity as Treasurer (collectively "Respondents" or "the Committee"). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

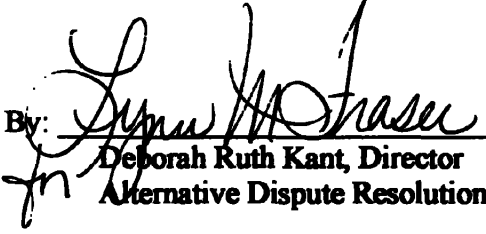
Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

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 guided by 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 referred the Respondents for the cumulative nature of deficiencies on reports filed with the Commission in the 2005-2006 cycle. A committee may be referred for audit if the cumulative nature of the reporting errors reveals the committee is not in substantial compliance with the law. 2 U.S.C. 438(b).
4. The Committee explained that it has instituted a number of steps to minimize future reporting errors. According to the Committee, it has purchased new reporting software and finalized the conversion to this software; each report now undergoes three reviews; an outside firm conducts yearly audits; staff annually attends FEC training seminars as well as software training; the Committee has hired extra staff to assist in reporting; and it is in the process of implementing a centralized tracking system for contributions from its affiliated and federal PACs.


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- 5. Respondents, in an effort to resolve this matter, agree to: (a) certify to the Commission that the results of the 2008 & 2009 audits met professional accounting standards and verify that the audit results are consistent with the financial activity reflected in the FEC reports and (b) pay a \$4000 civil penalty.
- 6. 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.
- 7. 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.
- 8. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms set forth in paragraph 5, except term (a), within thirty (30) days of the effective date of this agreement. The audit certifications for 2008 and 2009 set forth in term (a) shall be due April 30 2009 and April 30, 2010 respectively.
- 9. This Negotiated Settlement constitutes the entire agreement between the parties on the resolution of ADR 437 (RAD 07L-56), and effectively resolves only those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party that is not included herein shall be enforceable.

**FOR THE COMMISSION:**

By:  11-12-08  
 Deborah Ruth Kant, Director Date Signed  
 Alternative Dispute Resolution Office

**FOR THE RESPONDENTS:**

 5-1-08  
 Michael Trister, representing Date Signed  
 Laborers' Political League-Laborers'  
 International Union of N.A and Armand E. Sabitoni,  
 in his official capacity as Treasurer