



**Federal Election Commission  
Washington, DC 20463**

February 18, 2009

Christopher T. Craig  
Sparks & Craig LLP  
6862 Elm Street, Suite 360  
McLean, VA 22101

Re: ADR 438 (RAD 07L-57)  
Republicans for Choice PAC and Ann E.W. Stone, Treasurer

Dear Mr. Craig:

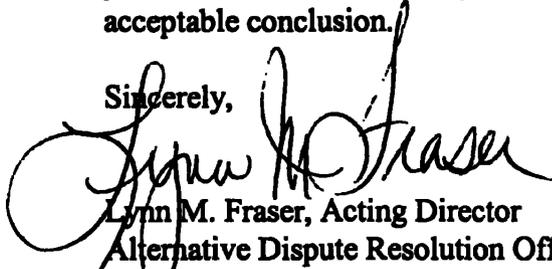
Enclosed is the signed copy of the agreement resolving the referral initiated on December 28, 2007 with the Federal Election Commission ("FEC/Commission") against Republicans for Choice PAC and Ann E.W. Stone, Treasurer ("Respondents"). The agreement for ADR 438 (RAD 07L-57) was approved by the Commission on February 10, 2009 – the effective date of the agreement.

Note the specific time frames for compliance in paragraph 9 of the agreement. Please forward to this office, a statement confirming Respondent's compliance with the terms listed in paragraph 6 of the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 6 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 February 9, 2010. 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: Ken Pezzella, Finance and Accounting Office  
Room 819

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**Federal Election Commission  
Washington, DC 20463**

**Case Number: ADR 438  
Source: RAD 07L-57  
Case Name: Republicans for Choice PAC**

### **NEGOTIATED SETTLEMENT**

This matter was initiated by the Federal Election Commission (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, (FECA) and resolve this matter, the Commission entered into negotiations with Christopher T. Craig, Esq., representing the Republicans for Choice PAC and Ann E. W. Stone, in her official capacity as Treasurer (the Committee or Respondents). 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 (RAD) referred the Respondents for the cumulative nature of deficiencies on reports filed with the Commission in the 2005-2006 election cycle which disclosed the Committee was not in substantial compliance with the FECA.
4. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. 2 U.S.C. § 437(g).
5. Respondents noted reporting challenges, and began addressing deficiencies during the 2006 election cycle by retaining the services of an outside compliance vendor, instituting new financial procedures and hiring staff experienced with FEC compliance. Respondents contend that, in addition to discussions with RAD and Audit staff, Respondents conducted an internal reconciliation of their financial records to the reports filed with the Commission from January 2005 through to the

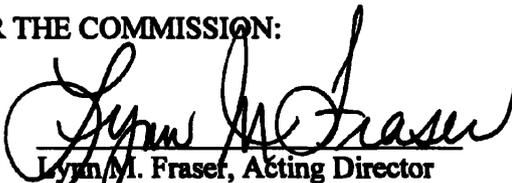
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present reports. In addition, Respondents assert that, following discussions with Commission staff, the Committee filed a memorandum entry in its 2008 May Monthly Report to clarify specific entries.

6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) send a representative to a FEC conference within twelve months of the effective date of this agreement; and (b) pay a civil penalty of \$2,500 within twelve months of the effective date of this agreement.
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. 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.
9. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms by the deadlines set out in paragraph 6 above.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 438 (RAD 07L-57), and resolves only those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

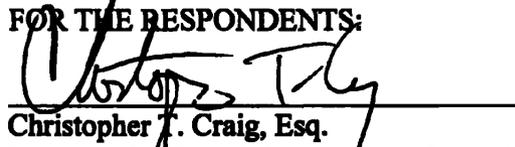
FOR THE COMMISSION:

By:

  
Lynn M. Fraser, Acting Director  
Alternative Dispute Resolution Office

2-10-09  
Date Signed

FOR THE RESPONDENTS:

  
Christopher F. Craig, Esq.  
Representing Republicans for Choice and  
Ann E. W. Stone, Treasurer

2/8/09  
Date Signed

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