



Federal Election Commission
Washington, DC 20463

May 14, 2010

Sal Bianco
The Doctors Company Federal PAC
185 Greenwood Road
Napa, CA 94558

Re: ADR 496 (RAD 09L-20)
The Doctors' Company Federal PAC and Leona Egeland Siadek, Treasurer

Dear Mr. Bianco:

Enclosed is the signed copy of the agreement resolving the referral initiated on – **June 9, 2009** – by the Federal Election Commission (“FEC/Commission”) involving The Doctors’ Company Federal PAC and Leona Egeland Siadek, Treasurer (“Respondents”). The agreement for **ADR 496 (RAD 09L-20)** was approved by the Commission on **April 27, 2010** – the effective date of the agreement.

Note the specific time frames for compliance in **paragraph 6** of the agreement. **Please forward to this office, a statement confirming Respondent’s compliance with the terms listed in 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 or before June 13, 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 complaint/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

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your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

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

Enclosure: Agreement

cc: Chris Wedderburn, Finance and Accounting Office
Room 819

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**Federal Election Commission
Washington, DC 20463**

Case Number: ADR 496
Source: RAD 09L-20
Case Name: The Doctors' Company
Federal PAC (DOCPAC)

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 Sal Bianco, representing the Doctors' Company Federal PAC (DOCPAC) and Leona Egeland Siadek, 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 Respondents for failing to disclose all financial activity on their 2008 12 Day Pre-General Report and their 2008 30 Day Post-General Report. Specifically, Respondents disclosed a negative ending cash balance of \$37,733.36 on their 2008 12 Day Pre-General Report. The Committee then filed its 2008 30 Day Post-General Report that also disclosed a negative ending cash balance of \$30,531.96.
4. Each treasurer of a political committee shall file reports of receipts and disbursements in accordance with the provisions of the FECA. 2 U.S.C. § 434(a)(1), 11 C.F.R. § 104.1(a). Each report filed must disclose the amount of cash on hand at the beginning of the reporting period, as well as at the close of the reporting period. 2 U.S.C. §§ 434(b)(1), 434(b)(8), 11 C.F.R. §§ 104.3(a)(1), 104.3(b)(1), 104.3(d).
5. Respondents acknowledge that some reports reflected a negative balance for cash on hand. Respondents contend that they conducted a voluntary review of all bank accounts

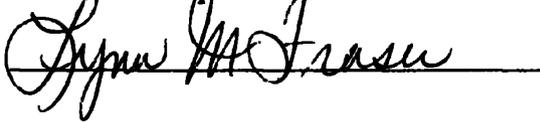
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from 2001 to the present time, and at no time did their bank account reflect a negative balance. Respondents further contend that they began an internal audit from 2004 through mid-June 2009, and worked with Commission staff to ensure that all financial data was accurately reflected on FEC reports. In addition, the Committee will continue to conduct a reconciliation of accounts to reports on a monthly basis.

6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) complete and certify an internal audit of all financial records and reports to the Commission from 2004 to June 15, 2009 within six (6) months of the effective date of this agreement; (b) amend all reports necessary to accurately reflect the financial activity of the Committee from 2004 to the present time within six (6) months of the effective date of this agreement; and pay a civil penalty of \$1,500 within thirty (30) days 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 of this agreement as set out in paragraph 6 above.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 496 (RAD 09L-20), and resolves 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:

Lynn M. Fraser, Director
Alternative Dispute Resolution Office



4-27-2010
Date Signed

FOR THE RESPONDENTS:



Sal Bianco
Representing The Doctors' Company Federal PAC
(DOCPAC) and Leona Egeland Siadek, Treasurer

November 30, 2009
Date Signed

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