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SEAFARERS INTERNATIONAL UNION ATLANTIC • GULF • LAKES AND INLAND WATERS DISTRICT

NATIONAL MARITIME UNION

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June 15, 2010

Krista Roche, Assistant Director
Alternative Dispute Resolution Office
Federal Election Commission
999 E Street, NW
Washington DC 20463

Re: ADR 542 (RAD 10L-05) Seafarers Political Activity
Donation (SPAD)

Dear Ms. Roche:

I am in receipt of your letter dated June 14, 2010 in which you have asked me to provide you with certain information relative to the above captioned matter. Please be advised that, while SPAD and its treasurer, Suzanne Plourde, do admit that a reimbursement was received from SPAD's connected organization after the thirty day period, SPAD and its treasurer do hereby assert that such actions were inadvertent and were taken without any intent to violate the Statute and/or any relevant regulations. SPAD's treasurer, at the time of the reimbursement, was ill and the individual acting in her stead, was unaware of the appropriate procedures. As soon as the parties were made aware of the situation, the initial reimbursement was refunded back to the connected organization from SPAD.

Due to the fact that no parties have been harmed by the transactions referenced above and the fact that there was no intent to violate any provisions of the Act, SPAD and its treasurer do agree to submit to ADR and are willing to consider a reasonable settlement; however, under the circumstances, we are not in a position to suggest any specific settlement amount at this time.

I am available to meet to discuss this matter sometime after mid September, 2010. Due to prior commitments I am not available to meet during the remainder of the summer. Please provide me with some possible dates from that point forward. Thank you very much.

Yours truly,

Leslie Tarantola