



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 10, 2011

David Martin
Campaign For Change
202 Bonham Road
Dedham, MA 02026

Re: ADR 552 (RAD 10L-12)
Campaign For Change and Nikolai Bobrov, Treasurer

Dear Mr. Martin:

Enclosed is the signed copy of the agreement resolving the referral initiated on November 12, 2010, by the Federal Election Commission ("FEC/Commission") involving Campaign For Change and Nikolai Bobrov, Treasurer ("Respondents"). The agreement for ADR 552 (RAD 10L-12) was approved by the Commission on January 7, 2011 – the effective date of the agreement.

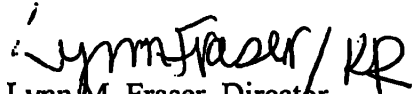
Note the specific time frames for compliance in paragraph 6 of the agreement. Please forward to this office, a statement confirming Respondent's compliance with the terms listed in the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms listed in 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 February 6, 2011. 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.

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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, Director
Alternative Dispute Resolution Office
202-694-1665

Enclosure: Agreement

cc: Gwendolyn Holmes, Finance and Accounting Office

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Campaign For Change
202 Bonham Road
Dedham, MA 02026

Re: ADR 552 (RAD 10L-12)
Campaign For Change and Nikolai Bobrov, Treasurer

Dear Mr. Martin:

Enclosed please find a Participant Evaluation from the Alternative Dispute Resolution Office (ADRO) at the Federal Election Commission (FEC). Evaluation by those who use the ADR processes is essential for determining if the ADR Program is accomplishing its goals.

The ADRO welcomes your evaluation of the process used to address the complaint or audit that was filed against you, your committee or client. After completing the enclosed questionnaire please return it to this office in the enclosed envelope.

Thank you for taking the time to reply to our survey and assisting us in evaluating the FEC's ADR Program.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Roche".

Krista J. Roche
Assistant Director
Alternative Dispute Resolution Office

Enclosure: Evaluation

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Federal Election Commission
Washington, DC 20463

Case Number: ADR 552
Source: RAD 10L-12
Case Name: Campaign for Change

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 David Martin representing the Campaign for change and Nikolai Bobrov, in his 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 2010 April Quarterly Report. The Committee filed its original report on April 16, 2010, followed by an amended 2010 April Quarterly Report on July 9, 2010 which disclosed additional receipts of \$120,653.26.
4. Treasurers of political committees are required to report all financial activity, including all receipts, pursuant to the FECA. 2 U.S.C. §§ 434(a)(1), 434(b)(2), 11 C.F.R. §§ 104.1, 104.3(a)
5. Respondents acknowledge inadvertently violating the FECA. Respondents contend they filed a memo text with the amended 2010 April Quarterly Report which stated that the original report was filed with incorrect receipt data due to data processing error.
6. Respondents, in an effort to avoid similar errors in the future, agree to: (a) develop and implement financial procedures complying with best practices within thirty (30) days of the effective date of this agreement; (b) develop and implement a reporting compliance manual

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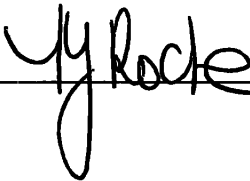
within thirty (30) days of the effective date of this agreement; (c) pay a civil penalty of \$1,500 within thirty (30) days of the effective date of this agreement; and (d) send a committee representative to a FEC conference within twelve (12) months of the effective date of this agreement.

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 of this agreement as set out in paragraph 6 above.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 552 (RAD 10L-12), 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


by Krista J. Roche
Acting Director





Date Signed

FOR THE RESPONDENTS:



David N. Martin
Representing the Campaign for Change and
Nickolai Bobrov, Treasurer

December 17, 2010

Date Signed

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