



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

July 8, 2011

Kimberly Kaegi, Treasurer  
Rock City PAC  
1015 Stonebridge Park Drive  
Franklin, TN 37069

Re: ADR 580 (RAD 11L-17)  
Rock City PAC and Kimberly Kaegi, Treasurer

Dear Ms. Kaegi:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The referral by the Reports Analysis Division (RAD) was based on a review of reports filed by the Rock City PAC which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

The FEC established the ADR Program to provide an informal means for resolving matters that come before the Commission and to facilitate negotiations directly with the Rock City PAC and Kimberly Kaegi, Treasurer (Respondents or the Committee). The ADR Program provides Respondents with an opportunity to negotiate settlement of a matter that is mutually agreeable. The negotiations occur prior to any Commission consideration of whether there is reason to believe a violation has occurred. If negotiations are successful, the resulting settlement concludes the matter.

The Commission, in referring the matter to the ADR Office, determined that the case is eligible for processing in the ADR program. If Respondents decide to participate in the ADR Program, you must: 1) indicate in writing a willingness to have your case submitted for ADR processing; 2) agree to participate in the bilateral interest based negotiations; and 3) waive the statute of limitations while the matter is being processed under the FEC's ADR program.

The issues referred to the ADRO, and the focus of our subsequent negotiations are summarized as follows:

**Summary of Case:** RAD referred the Rock City PAC and Kimberly Kaegi, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on their 2010 October Quarterly Report. Respondents filed the original 2010 October Quarterly Report on October 15, 2010. On October 27, 2010, the Committee filed an amended report that disclosed additional receipts totaling \$70,000 and additional disbursements totaling \$53,638.15.

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
999 E STREET N.W., WASHINGTON, DC 20463  
TELEPHONE: 202.694.1665 FAX: 202.219.0613  
EMAIL: lfraser@fec.gov

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Respondents stated that there were a couple of receipts and disbursements that were coded incorrectly and thus not disclosed on their 2010 October Quarterly Report. The error was noted and an amended report filed to correct the record.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondents would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR form. **Failure to respond affirmatively within fifteen (15) business days of receipt of this letter will be taken as a notice of disinterest in the program and your case will be dropped from further consideration for ADR.** In that event, your case will be sent to the FEC's Office of General Counsel for further processing, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as **ADR 580**. Please refer to this number in future correspondence with the FEC. If you have questions about the ADR Program, please contact the ADRO at my direct dial as indicated below

Sincerely,

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

Enclosures: ADR Frequently Asked Questions  
Commitment to Submit Matter to ADR  
Designation of Representative/Counsel