



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

July 13, 2011

John Pomeranz, Esq.  
Harmon, Curran, Spielberg & Eisenberg LLP  
1726 M Street NW, Suite 600  
Washington, DC 20036

Re: ADR 582 (Pre-MUR 510)  
One America Votes and Washington Community Action Network

Dear Mr. Pomeranz:

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 Office of General Counsel was based on a *sua sponte* submission filed by One America Votes and the Washington Community Action Network which advised the Commission of a possible violation of the Federal Election Campaign Act of 1971, as amended by these One America Votes and the Washington Community Action Network.

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 One America Votes (OAV) and the Washington Community Action Network (Washington CAN) (collectively Respondents). 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:** The Office of General Counsel referred the *sua sponte* submissions filed by One America Votes (Respondent OAV) and the Washington Community Action Network (Respondent Washington CAN) (collectively Respondents). In the submissions, Respondents assert that they made expenditures expressly advocating the election or

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defeat of a candidate for federal office and failed to report the communications to the Commission. In addition, Respondents stated there were incomplete or omitted disclaimers, as well as a failure to file all required reports.

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 582**. 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