



FEDERAL ELECTION COMMISSION
Washington, DC 20463

June 29, 2012

Edward Britan, Esq.
Alston & Bird
950 F Street NW
Washington, DC 20004-1404

Re: ADR 620 (Pre-MUR 541)
National Association of Professional Employer Organizations, National Association of
Professional Employer Organizations PAC and Thom Stohler, Treasurer

Dear Mr. Britan:

The Federal Election Commission (FEC or Commission) referred the *sua sponte* submission by the National Association of Professional Employer Organizations to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The submission alleges a violation of the Federal Election Campaign Act of 1971, as amended by the National Association of Professional Employer Organizations and its separate segregated fund, the National Association of Professional Employer Organizations PAC.

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 National Association of Professional Employer Organizations, the National Association of Professional Employer Organizations PAC and Thom Stohler, Treasurer (collectively 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: In a *sua sponte* submission, the National Association of Professional Employer Organizations ("NAPEO"), on behalf of itself and its separate segregated fund, the National Association of Professional Employer Organizations PAC and Thom

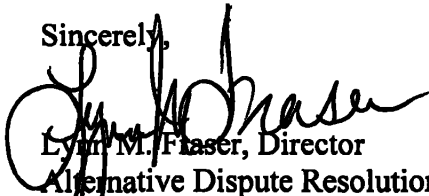
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Stohler, Treasurer (Respondents or the Committee or collectively "Respondents") acknowledges that it failed to file an amended Statement of Organization after the departure of the PAC's treasurer; signed the former treasurer's name on its year-end report; and filed its 2011 year-end report late. NAPEO maintains that the violations resulted from extensive personnel turnover, including the resignation of the Committee's chairman and treasurer in August 2011.

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 620**. 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

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