



FEDERAL ELECTION COMMISSION
Washington, DC 20463

June 25, 2013

James Carson
3425 McKnight Road North
White Bear Lake, MN 55110-5558

Re: ADR 640 (MUR 6700)
4th Congressional District Republican Party of Minnesota and Beverly Aplikowski,
Treasurer, James Carson, and Skip Wolverton

Dear Mr. Carson:

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 for a complaint filed by John Kysylyczyn alleging 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 James Carson (Respondent Carson). 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: The OGC referred a complaint filed by John Kysylyczyn alleges the 4th Congressional District Republican Party of Minnesota and Beverly Aplikowski, Treasurer (the Committee), former Treasurer Skip Wolverton, (Respondent Wolverton) and former Chairman of the 4th Congressional District Republican Party of Minnesota, James Carson (Respondent Carson) (collectively Respondents) violated by FECA. Complainant alleges the violations occurred due to a failure to file disclosure reports timely, improperly obtaining an administrative termination, a failure to have adequate

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disclaimers on fundraising documents, and a failure to proportion event costs between federal and non-federal accounts.

In their responses, Respondents contend there were some reports not filed timely due to confusion over an administrative termination of the Committee's reporting obligations by the Commission, that the fundraising referred to by Complainant was a convention and not a fund raising event, and that the convention fees were not federal election activity.

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 640**. 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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