



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

April 25, 2014

Heidi K. Abegg, Esq.  
Webster, Chamberlain & Bean LLP  
1747 Pennsylvania Avenue N.W.  
Washington, DC 20006

Re: ADR 714 (RR 14L-04)  
American Principles in Action

Dear Ms. Abegg:

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 American Principles in Action 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 American Principles in Action (Respondent or the Committee). The ADR Program provides Respondent 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 Reports Analysis Division referred American Principles in Action (Respondent) for failing to file two (2) 48-Hour Reports totaling \$74,496.50 to support eight (8) independent expenditures disclosed on its 2012 October Quarterly Report. On October 11, 2012, Respondent filed its 2012 October Quarterly Report disclosing nine (9)

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

independent expenditures totaling \$75,305 in opposition to one (1) federal candidate on the Schedule 5-E. Eight (8) of the independent expenditures required two (2) 48-Hour Reports.

In response to a Request for Additional Information sent to the Respondent on September 3, 2013, Respondent filed a Miscellaneous Document Submission ("Form 99") on January 13, 2014. In the Form 99, Respondent stated that it was unable to explain why the two 48-Hour Reports for eight (8) independent expenditures disclosed on the 2012 October Quarterly Report were not filed. Respondent states there had been staff turnover, and records were in disarray.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent would like to participate in ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Participate in 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 714**. 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 Participate in ADR  
Designation of Representative/Counsel

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