



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

June 5, 2014

Anthony M. Perrone, Treasurer  
United Food and Commercial Workers International Union Active Ballot Club  
1775 K Street NW  
Washington, DC 20006

Re: ADR 719 (RAD 14L-15)  
United Food and Commercial Workers International Union Active Ballot Club and  
Anthony M. Perrone, Treasurer

Dear Mr. Perrone:

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 United Food and Commercial Workers International Union Active Ballot Club 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 United Food and Commercial Workers International Union Active Ballot Club and Anthony M. Perrone, 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 would conclude 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:

RAD referred Respondents for failing to disclose all financial activity on the 2012 12 Day Pre-General Report originally filed October 25, 2012. On December 3, 2012 and January 29, 2013, the Committee filed amended reports disclosing additional receipts totaling \$70,572.41.

In a Miscellaneous Electronic Submission ("Form 99") filed on July 12, 2013, the Committee stated that the omissions occurred because the receipts were inadvertently not posted to the internal accounting system used for filing FEC reports. The Committee contends the report was amended after the discrepancy was discovered during a routine bank reconciliation.

If after reviewing this letter and the enclosed ADR Frequently Asked Questions, which describe the ADR program, Respondent(s) 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 719**. 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,



Krista J. Roche  
Assistant Director  
Alternative Dispute Resolution Office

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