



FEDERAL ELECTION COMMISSION
Washington, DC 20463

September 26, 2014

Caleb Crosby, Treasurer
Congressional Leadership Fund
1747 Pennsylvania Avenue NW 5th Floor
Washington, DC 20006

Re: ADR 734 (RAD 14L-30)
Congressional Leadership Fund and Caleb Crosby, Treasurer

Dear Mr. Crosby:

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 the Congressional Leadership Fund 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 the Congressional Leadership Fund and Caleb Crosby, 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 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: RAD referred the Congressional Leadership Fund and Caleb Crosby, Treasurer (Respondents or the Committee) for failing to disclose all its financial activity on its 2012 July Quarterly, its 2012 October Quarterly and its 2012 30 Day Post-General Reports. The Committee filed these three original reports on July 15, 2012, October 15,

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2012 and December 6, 2012 respectively. Amended 2012 July Quarterly Reports were filed on July 27, 2012 and December 19, 2012 that disclosed additional receipts of \$14,000.00. An Amended 2012 October Quarterly Report was filed on December 19, 2012 disclosed additional receipts of \$35,000. An Amended 2012 30 Day Post-General Report was also filed on December 19, 2012 that disclosed additional receipts of \$10,264.18. The aggregate of additional receipts for these 3 reports is \$59,264.18.

Respondents contend that administrative oversight caused \$55,264.18 of in-kind contributions not to be included in the reports. In addition, a vendor belatedly notified the Committee of a \$4,000 contribution received, and it was included in the Amended 2012 July Quarterly Report filed July 27, 2012.

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 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 734**. 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