



FEDERAL ELECTION COMMISSION
Washington, DC 20463

October 14, 2014

Mary Doster, Treasurer
Pure Political Action Committee
2870 Dobie Road
Mason, MI 48854

Re: ADR 737 (RAD 14L-35)
Pure Political Action Committee and Mary Doster, Treasurer

Dear Ms. Doster:

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 Pure Political Action Committee 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 Political Action Committee and Mary Doster, 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 timely file three (3) 48-Hour Reports totaling \$28,461.72 to support three (3) independent expenditures disclosed on the 2013 Year-End Report.

In a Miscellaneous Electronic Submission (Form 99) filed on May 27, 2014, the Committee explained that the \$28,461.72 represented production costs for three

television spots. While the Committee filed the required 48-Hour Reports for dissemination costs related to the television spots, it did not view production costs as expenditures that directly resulted in public communications, and therefore did not file 48-Hour Reports.

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 737. 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