



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

October 14, 2014

Nancy H. Watkins, Treasurer  
Many Individual Conservatives Helping  
Elect Leaders Everywhere (MICHELEPAC)  
610 South Boulevard  
Tampa, FL 33606

Re: ADR 738 (RR 14L-33)  
Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC) and Nancy  
H. Watkins, Treasurer

Dear Ms. Watkins:

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 Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC) 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 Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC) and Nancy H. Watkins, 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:

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

**SUMMARY:** RAD referred Many Individual Conservatives Helping Elect Leaders Everywhere (MICHELEPAC) and Nancy H. Watkins, Treasurer<sup>1</sup> (the Committee or Respondents) amended its 2010 October Monthly, 2010 30 Day Post-General, 2010 Year End, 2011 February Monthly, 2011 April Monthly, 2011 May Monthly, and 2011 October Monthly Reports to disclose additional receipts of \$98,576.55 and additional disbursements of \$47,758.32, which were not disclosed in the original reports, an aggregate increase in activity totaling \$146,334.87.

Respondents contend that the majority of the increases in both receipts and disbursements were as a result of fundraising activity. The Committee inadvertently did not include all credit card transactions.

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 738**. 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

<sup>1</sup> Nancy H. Watkins, Treasurer (9/5113- Present), and Barry Arrington, Treasurer (7114/10- 9/4/13)