



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

November 10, 2014

Robert D. Lenhard, Esq.  
Covington & Burling LLP  
1201 Pennsylvania Ave, NW  
Washington, DC 20004-2401

Re: ADR 741 (RR 14L-23)  
CE Action Committee and Rita Copeland, Treasurer

Dear Mr. Lenhard:

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), which was transferred from the Office of General Counsel (OGC), was based on a review of reports filed by CE 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 CE Action Committee and Rita Copeland, 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 four (4) 48-Hour Reports totaling \$62,865.81 to support fourteen (14) independent expenditures made in March and April 2013 which were disclosed on the Amended 2013 12 Day Pre-Special Report, received September 27, 2013. In addition, on June 19, 2013, the Committee amended its 2013 12-

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE  
999 E STREET N.W., WASHINGTON, DC 20463  
TELEPHONE: 202.694.1661 FAX: 202.219.0613  
EMAIL: KROCHE@FEC.GOV

Day Pre-Special Report, originally filed on April 18, 2013, to disclose additional debts totaling \$124,842.93.

On September 27, 2013, the Committee filed a Miscellaneous Electronic Submission (Form 99) to explain the omissions. The Committee stated it had recently been formed at the time the original 2013 12 Day Pre-Special was filed. The Committee contends that it received invoices for debts and independent expenditures from its political consultants after the original report was filed. The Committee states that it now has a better system for tracking work performed by consultants to facilitate timely reporting of accrued expenses and 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 741**. 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