



**FEDERAL ELECTION COMMISSION  
Washington, DC 20463**

March 23, 2015

Laurence E. Gold  
Trister, Ross, Schadler & Gold, PLLC  
1666 Connecticut Avenue NW, Fifth Floor  
Washington, DC 20009

Re: ADR 750 (RR 15L-01)  
Brotherhood of Railroad Signalmen Political Action Committee and Jerry C. Boles,  
Treasurer

Dear Mr. Gold:

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 Brotherhood of Railroad Signalmen 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 the Brotherhood of Railroad Signalmen Political Action Committee and Jerry C. Boles, 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 Committee for failing to disclose all financial activity on its 2010 May Monthly, 2010 June Monthly, 2010 July Monthly, 2010 30 Day Post-General, 2010 Year-End, 2011 February Monthly, 2011 March Monthly, 2011 April

15-00001-1520

Monthly, 2011 May Monthly, 2011 June Monthly, 2011 July Monthly, 2011 October Monthly, 2012 February Monthly, 2012 March Monthly, 2012 May Monthly, 2012 June Monthly, 2012 July Monthly, 2012 August Monthly and 2012 October Monthly Reports to disclose additional receipts totaling \$76,504.89 and additional disbursements totaling \$30,569.95. The activity on these eighteen reports resulted in an aggregate increase in activity totaling \$107,074.84.

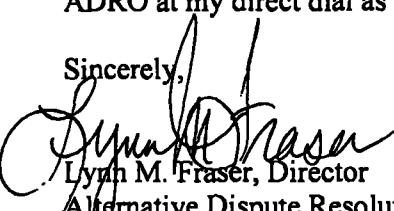
On February 28, 2013, the Committee filed a Miscellaneous Electronic Submission (Form 99), which stated, in part:

"We are a railroad union and our members voluntarily may contribute to what we title the "Signalmen's Political League" (SPL), our internal name for the Political Action Committee. These deductions are made by their employers (Carriers) and deposited into our PAC account or a check is mailed to our office. With this, the carriers are to include a "deduction sheet" so that we will know who has given and in what amount on each deposit or check. On some occasions the Carrier does not provide the deduction sheet at the time of the payment and we are left to track it down. With this process, we are not always able to find this information in time for each monthly report. When we receive this information, an amendment is filed. We work diligently each time to provide accurate information at the time each report is due, and work regularly with each carrier to receive a complete deduction sheet from them, but, at times, we are unable to obtain that information in a timely fashion.

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 750**. 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