



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

November 3, 2015

Sharon Sund for Congress  
Eugene Roberson, Treasurer  
14400 10<sup>th</sup> Ave, N  
Plymouth, MN55447

Re: ADR 781 (MUR 6890)  
Sharon Sund for Congress and Eugene Roberson, Treasurer

Dear Mr. Roberson and Ms. Sund:

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 Office of General Counsel was based on a complaint filed by Nicholas Passanante which alleges a violation of the Federal Election Campaign Act of 1971, as amended by Sharon Sund for Congress.

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 Sharon Sund for Congress and Eugene Roberson, 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:

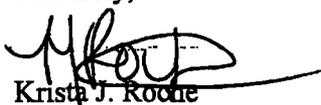
**Summary of Case:** On October 16, 2014, Nicholas A. Passanante, of BoulderStrategies LLC, (Complainant) filed a complaint against Sharon Sund for Congress and Eugene Roberson, Treasurer, (Respondents or the Committee) for failing to disclose a debt. The Complainant alleges that BoulderStrategies LLC was owed \$14,840.82, which was not reflected on the Committee's 2014 October Quarterly Report.

In response to the Complaint, the Committee asserts that the debt was disputed and eventually settled for \$11,000, after an initial offer of \$9,500 was rejected. The Committee reported two debts of \$6,500 and \$4,500 (totaling \$11,000) to BoulderStrategies LLC on its 2014 30 Day Post-General Report. The \$4,500 debt is shown as paid on the Committee's 2014 Year-End Report and the \$6,500 debt is shown as paid on the Committee's 2015 April Quarterly Report.

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 781**. 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