



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 31, 2017

Wayne Cockfield, Treasurer
National Right to Life Victory Fund
512 10th St., NW
Washington, DC 20004

Re: ADR 819 National Right to Life Victory Fund and Wayne Cockfield, Treasurer

Dear Mr. Cockfield:

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 National Right to Life Victory Fund 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 National Right to Life Victory Fund and Wayne Cockfield, 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: RAD referred National Right to Life Victory Fund (Respondent or the Committee) for failure to disclose all financial activity on its 2016 July Quarterly Report, originally filed on July 15, 2016. On August 1, 2016, the Committee filed an Amended 2016 July Quarterly Report disclosing additional disbursements totaling \$169,275.62.

NATIONAL RIGHT TO LIFE

In an FEC Form 99 file on December 18, 2016, the Committee stated that the original report was filed based upon information available at the time. The Committee contends that when new information became available, the report was immediately amended. In the Form 99 the Committee further states that it "will continue to review its procedures to ensure accurate information is filed in a timely manner."

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 819**. 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

UNCLASSIFIED