



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

July 12, 2017

Bill Combs  
21<sup>st</sup> Century Democrats  
2120 L St, NW, Suite 305  
Washington, DC 20037

Re: ADR 831 (RAD 17L-18)  
21<sup>st</sup> Century Democrats and Bill Combs, Treasurer

Dear Mr. Combs:

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/Audit Division (RAD) was based on a review of reports filed by 21<sup>st</sup> Century Democrats 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 21<sup>st</sup> Century Democrats and Bill Combs, 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:

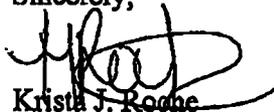
**Summary of Case:** RAD referred 21<sup>st</sup> Century Democrats and Bill Combs, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2016 30-Day Post-General Report, originally filed on December 8, 2016. On February 15, 2016, the Committee filed an Amended 2016 30-Day Post-General Report including \$118,367.13 in additional receipts.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on April 27, 2017, indicating that the Committee "reviewed its disclosure process and has completed an exhaustive internal audit of all data processed during FY2016." The Committee contends that the error was due to a vendor who did not properly upload itemized donor data and that the Committee amended reports once the data was uploaded. In addition, the Committee indicates that it "has taken major steps to adequately correct its disclosure process to be in compliance with the Commission's guidelines."

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 831. 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  
Acting Director  
Alternative Dispute Resolution Office