



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 5, 2018

Carolyn Utrecht, Esq.
Utrecht, Kleinfeld, Fiori, Partners
1776 Eye Street NW, Tenth Floor
Washington, DC 20006

Re: ADR 867 (RR 18L-05)
Working for Us Political Action Committee Inc. and Steven Rosenthal, Treasurer

Dear Ms. Utrecht:

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 review of reports filed by Working for Us Political Action Committee Inc. 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 Working for Us Political Action Committee Inc. and Steven Rosenthal, 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 Working for Us Political Action Committee Inc. and Steven Rosenthal, Treasurer (Respondents or the Committee) for failing to file one (1) 24-Hour Report totaling \$88,508.48 to support four (4) independent expenditures disclosed on the 2016 July Quarterly Report.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on August 22, 2017, indicating that the 24-Hour Report was produced to be filed on April 22, 2016,

however, due to a clerical error the wrong report was filed on that day. The report filed was a duplicate of a report filed on April 16, 2016. On August 22, 2017, the Committee filed a 24-Hour Report covering these expenditures.

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 from the date 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 867**. 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

Krista J. Roche
Director
Alternative Dispute Resolution Office

Enclosures: ADR Frequently Asked Questions
Commitment to Participate in ADR & Designation of Representative/Counsel