



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

May 14, 2018

Martha Kuhl, Treasurer  
National Nurses United for Patient Protection  
8630 Fenton Street, Suite 1100  
Silver Spring, MD 20910

Re: ADR 868 (RR 18L-08)  
National Nurses United for Patient Protection and Martha Kuhl, Treasurer

Dear Martha Kuhl:

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 National Nurses United for Patient Protection 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 Nurses United for Patient Protection and Martha Kuhl, 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 National Nurses United for Patient Protection and Martha Kuhl, Treasurer (Respondents or the Committee) for failing to file four (4) 48-Hour Reports totaling \$28,049.00 to support five (5) independent expenditures and failing to file six (6) 24-Hour Reports totaling \$49,860.41 to support eight (8) independent expenditures disclosed on the 2016 July Quarterly Report.

The Committee filed a Miscellaneous Electronic Submission (Form 99) on September 29, 2017, indicating that all independent expenditures that were unreported or untimely reported were done so inadvertently and without any intention to violate the FECA. The Committee contends that the vast majority of its independent expenditures for 2016 were timely and accurately reported.

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 868**. 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,

KJ Roche

Krista J. Roche  
Director  
Alternative Dispute Resolution Office

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