



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 14, 2019

Michael J. Bell, Esq.
HOGAL LEVELLS
555 Thirteenth Street, NW
Washington, DC 20004

Re: ADR 895 (MUR 7480)
Haworth, Inc.
Outsider PAC and Julie Dozier, Treasurer

Dear Mr. Bell:

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 Campaign Legal Center which alleges a violation of the Federal Election Campaign Act of 1971, as amended, by Haworth, Inc.

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 Outsider PAC and Julie Dozier, 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:

On August 17, 2018, Campaign Legal Center filed a Complaint alleging that Haworth, Inc. violated FECA's prohibition on federal contractors making contributions to political committees while negotiating or performing federal contracts. The Complaint further alleged that Haworth, Inc. has been the recipient of federal contracts and grants dating back to at least 2001, and contributed \$10,000 to Outsider PAC, an independent expenditure only committee, on July 18, 2018. Concurrently, on August 21, 2018, counsel to Haworth,

Inc. filed a sua sponte submission stating that they requested a full refund of a July 18, 2018 contribution to Outsider PAC.

In a response from Outsider PAC's counsel, dated October 18, 2018, the Committee contends that the PAC could not have committed any violation simply by receiving the contribution from Haworth. Instead, the only way the PAC could have violated the Act is if it knowingly solicited the contribution from Haworth. There are no facts alleged in the Compliant that the PAC knew Haworth was a federal contractor. There was no additional response from Haworth, Inc. after their sua sponte submission on August 21, 2018.

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 895**. 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

Director

Alternative Dispute Resolution Office

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