



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 18, 2019

Scott Pullins, Treasurer  
Ohio Majority Trust  
110 East Gambier Street  
Mount Vernon, OH 43050

**Response Due Date**  
**May 4, 2019**

**Re: ADR 905 (RAD 19L-04)**  
Ohio Majority Trust and Scott Pullins, Treasurer

Dear Scott Pullins:

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 was based on a review of reports filed by Ohio Majority Trust which reflect a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

An email was sent to your office on March 21, 2019, regarding an opportunity to participate in the ADR program at the Commission to resolve this matter. To date, the Commission has received no response. 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 Ohio Majority Trust and Scott Pullins, 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:

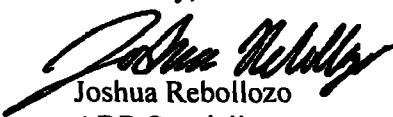
RAD referred Ohio Majority Trust and Scott Pullins, Treasurer (Respondents or the Committee) for failing to file one (1) 48-Hour Report totaling \$35,000 for an independent expenditure disclosed on the 2017 Year-End Report.

During a phone call with RAD, the Respondents indicated that the 48-Hour Report was not filed since the candidate, for whom the independent expenditure was made, had dropped out of the race. On October 24, 2018, the Respondents filed one (1) 48-Hour Report to support one (1) independent expenditure of \$35,000.

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 by May 4, 2018 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 905**. 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,



Joshua Rebollozo  
ADR Specialist  
Alternative Dispute Resolution Office