



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 24, 2019

Art Pulaski, Treasurer  
Million More Voters, Sponsored by the  
California Labor Federation, AFL-CIO  
600 Grand Avenue, Suite 410  
Oakland, CA 94610

**Response Due Date**  
**August 14, 2019**

Re: ADR 920 (RAD 19L-16)  
Million More Voters, Sponsored by the California Labor Federation, AFL-CIO and Art  
Pulaski, Treasurer

Dear Art Pulaski:

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 Million More Voters, Sponsored by the California Labor Federation, AFL-CIO 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 Million More Voters, Sponsored by the California Labor Federation, AFL-CIO and Art Pulaski, 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 Million More Voters, Sponsored by the California Labor Federation, AFL-CIO and Art Pulaski, Treasurer (Respondents or the Committee) for failing to disclose all newly incurred debts on its 2018 October Quarterly Report, originally filed on October 15, 2018. On December 17, 2018, the Committee filed an Amended 2018 October Quarterly Report including \$196,452.00 in newly incurred debts that were not disclosed on the original report.

The Committee filed a Form 99 (Miscellaneous Electronic Submission) on May 20, 2019, contending that the previously undisclosed debts did not relate to the Committee's federal activities. Respondents further stated that the newly incurred debts were disclosed on an amended report once the Committee became aware of the invoices.

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 920**. 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