



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 19, 2019

Zinnia Kallabat, Treasurer
Working Michigan (SuperPac)
419 S. Washington, Suite 200
Lansing, MI 48933

**Response Due Date
September 9, 2019**

Re: ADR 924 (RAD 19L-21)
Working Michigan (SuperPac) (C00627240) and Zinnia Kallabat, Treasurer

Dear Zinnia Kallabat:

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 (RAD) was based on a review of reports filed by Working Michigan (SuperPac) 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 Michigan (SuperPac) and Zinnia Kallabat, 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 Michigan (SuperPac) and Zinnia Kallabat, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2018 October Quarterly Report, originally filed on October 14, 2018. On December 5, 2018,

FEDERAL ELECTION COMMISSION, ALTERNATIVE DISPUTE RESOLUTION OFFICE
1050 FIRST STREET N.E., WASHINGTON, DC 20463
TELEPHONE: 202.694.1661
EMAIL: ADR@FEC.GOV

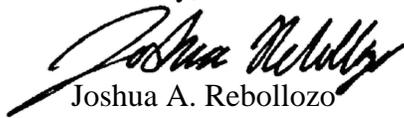
the Committee filed an Amended 2018 October Quarterly Report including \$59,193.41 in additional receipts and \$55,207.39 in additional disbursements.

In memo text attached to the Amended 2018 October Quarterly Report filed on May 7, 2019, the Committee stated that the failure to disclose all activity was inadvertent and was the result of a lack of communication. In addition, the Committee states that since this incident, they have implemented procedures with their vendors and field workers to receive information on a daily basis to ensure more accurate and timely filed reports.

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 924**. 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 A. Rebollozo

ADR Specialist

Alternative Dispute Resolution Office