



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 8, 2019

Brent Andersen, Treasurer
Massachusetts Republican Party
85 Merrimac Street, Suite 400
Boston, MA 02114

Response Due Date
October 18, 2019

Re: ADR 925 (RAD 19L-22)
Massachusetts Republican Party and Brent Andersen, Treasurer

Dear Mr. Andersen:

The Federal Election Commission (FEC or Commission) referred a compliance issue to the FEC's Alternative Dispute Resolution Office (ADR Office) for processing. The basis of the referral by the Reports Analysis Division was the review of reports filed by Massachusetts Republican Party, which reflects a possible failure to comply with the Federal Election Campaign Act of 1971, as amended.

An email was sent to your office on September 6, 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 Massachusetts Republican Party and Brent Andersen, 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 Massachusetts Republican Party and Brent Anderson, Treasurer (Respondents or the Committee) for failing to disclose newly incurred debts on its 2018 12-Day Pre-General Report, originally filed on October 24, 2018. On March 20, 2019, the Committee filed an Amended 2018 12-Day Pre-General Report including \$108,663.84 in newly incurred debts that were not disclosed on the original report.

On April 12, 2019, the Committee filed a Form 99 (Miscellaneous Electronic Submission) stating that the debt was inadvertently not disclosed as a result of a staff miscommunication and clerical error. In an additional Form 99 filed on June 28, 2019, the Committee stated that they have since taken remedial actions including changing accounting and compliance firms and initiating weekly meetings to discuss payables and tracking them in a live system.

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 October 18, 2019 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 925**. 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