



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 12, 2019

James Rinefierd, Treasurer  
Human Rights Campaign Equality Votes  
1640 Rhode Island Ave NW  
Washington, DC 20036

**Response Due Date**  
**December 4, 2019**

Re: ADR 948 (RAD 19L-39)  
Human Rights Campaign Equality Votes and James Rinefierd, Treasurer

Dear James Rinefierd:

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 Human Rights Campaign Equality Votes 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 Human Rights Campaign Equality Votes and James Rinefierd, 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 Human Rights Campaign Equality Votes and James M. Rinefierd, Treasurer (Respondents or the Committee) for failing to timely file two (2) 24-Hour Reports totaling

\$31,350.00 to support six (6) independent expenditures disclosed on the Amended 2018 30 Day Post-General Report.

In a Form 99 (Miscellaneous Electronic Submission) filed on July 25, 2019, the Committee stated that the failure to file the reports was an administrative error. Further, the Committee stated that they have since implemented additional internal training and procedures to ensure all independent expenditures are timely filed in the future.

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 948**. 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