

# **SANDLER REIFF**

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May 5, 2017

Elena Paoli  
Office of the General Counsel  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20462

Re: MUR 7035

Dear Ms. Paoli,

This response is filed on behalf of our client, the Australian Labor Party ("ALP"), to the reason to believe finding, and your request for more information in the above-referenced matter under review. You asked us for the number of delegates that were observing Bernie 2016 and America Votes. There were 7 delegates with Bernie 2016 and 8 with America Votes. You also asked us for the amount spent for flights and travel allowance stipends. For the Bernie 2016 delegates, ALP spent \$23,503 on flights and \$12,060 in stipends, both in Australian dollars. Using the exchange rate for January 15, 2016, which was the time period of the delegate program, in U.S. dollars that amounts to \$16,140 for flights and \$8,282 for stipends.

Additionally, you asked how delegate assignments were made. Some delegates expressed a preference and the ALP tried to accommodate the preferences. Other delegates simply expressed a preference for observing the US primaries and ALP made assignments on their behalf.

The ALP strongly disagrees to the Commission's reason to believe finding. The delegates participating in the Program were not performing personal services while observing Bernie 2016. The primary purpose of the Program was not to influence elections but to exchange ideas regarding progressive and social democratic ideas across the world and use the lessons learned by the delegates and their progressive work in Australia. As discussed in ALP's initial response, the 2016 program was similar to programs ALP engaged in in previous years (including with the US State Department) and the ALP did not intend in any way to violate Federal Election Campaign Finance Act of 1971, as amended or Commission regulations.<sup>1</sup>

The ALP recognizes the unique relationship between Australia and the U.S. and given this, wishes to bring about a quick and mutually agreeable resolution to this matter, ALP is interested in pursuing pre-probable cause conciliation, and hereby requests that the Office of the

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<sup>1</sup> See Response to MUR 7035 at 2.

**General Counsel make a recommendation to the Commission to pursue conciliation, or in the alternative, refer this matter to the Commission's Alternative Dispute Resolution Division based upon the small amounts spent on travel costs associated with the program.**

Sincerely,

A handwritten signature in black ink, appearing to read 'Neil Reiff', written in a cursive style.

**Neil Reiff  
Dara Lindenbaum  
Counsel to the Australian Labor Party**