



**Federal Election Commission  
Washington, DC 20463**

September 26, 2006

Neil Reiff, Esq.  
Sandler, Reiff & Young, P.C.  
50 E Street, S.E. #300  
Washington, DC 20003

Re: ADR # 322/RR 06L-09  
International Association of Firefighters Interested in Registration and Education  
PAC and Vincent J. Bollon, Treasurer

Dear Mr. Reiff:

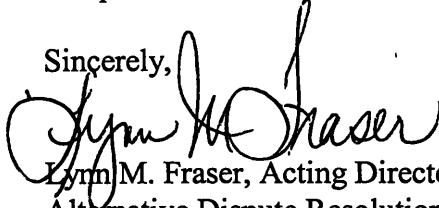
Enclosed is the signed copy of the agreement resolving the referral initiated on March 10, 2006 with the Federal Election Commission ("FEC/Commission") against International Association of Firefighters Interested in Registration and Education PAC ("Respondents"). The agreement for ADR 322 (RR 06L-09) was approved by the Commission on September 14, 2006 – the effective date of the agreement.

Note that paragraph 11 of the agreement specifies that Respondents shall comply with the terms (a) and (b) in paragraph 8 above within thirty (30) days from the effective date of this agreement. Respondents shall comply with the term (c) within twelve (12) months of the effective date of this agreement. Please forward to this office, a statement confirming Respondents' compliance with the terms listed in paragraph 8 of the aforementioned agreement. The letter should note the dates on which Respondents satisfied each of the terms listed in paragraph 8.

As you are aware, the settlement agreement will be made part of the record that is released to the public. The Commission will also place on the record copies of the referral, correspondence exchanged between your office and this office prior to our entry into settlement negotiations and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

This agreement resolves the matter that was initiated by the Commission pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities regarding violations of federal election campaign laws. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn M. Fraser".

Lynn M. Fraser, Acting Director  
Alternative Dispute Resolution Office  
202-694-1665

Enclosure: Agreement

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Federal Election Commission  
Washington, DC 20463

Case Number: ADR 322

Source: RR 06L-09

Case Name: International Association of Firefighters  
Interested in Registration and Education PAC

### NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission ("Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, ("FECA") and resolve this matter, the Commission entered into negotiations with Neil Reiff, Esq., representing the International Association of Firefighters Interested in Registration and Education PAC and Vincent J. Bollon, Treasurer, in his official capacity as Treasurer ("the Committee" or "Respondents"). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures ("ADR") is authorized in "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 2 U.S.C. § 437g.
2. Respondents voluntarily enter into this agreement with the Commission.
3. RAD referred the Respondents for failing to file required 48-Hour and 24-Hour Notices, as well as all financial activity on their 2005 March Monthly Report. Specifically, the Committee failed to file four (4) 48-Hour Notices to support four (4) independent expenditures, totaling \$102,993.20 made between January 1<sup>st</sup> and the 20<sup>th</sup> day before the 2004 Presidential Primary Elections held in the States of Arkansas and Kentucky, and between January 1<sup>st</sup> and the 20<sup>th</sup> day before the 2004 General Election. Respondents also failed to file four (4) 24-Hour Notices to support five (5) independent expenditures, totaling \$35,584.50 made less than 20 days, but more than 24 hours, before the 2004 General Election. Additionally, the Committee filed Amended 2005 March Monthly Reports on April 4, 2005, and May 13, 2005, disclosing \$75,249.79 in additional receipts.
4. The FECA and the implementing regulations require that a political committee which makes, or contracts to make, independent expenditures in connection with an election may have to file 48-Hour and 24-Hour Notices with the Commission. The 48-Hour Notice requirement will be triggered each time the committee makes independent expenditures

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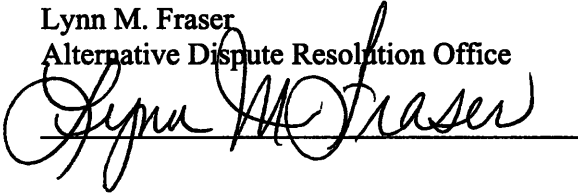
aggregating \$10,000 or more at any time up to and including the 20<sup>th</sup> day before the date of an election. 2 U.S.C. § 434(g)(2), 11 C.F.R. § 104.4(b)(2). The 24-Hour Notice requirement is triggered each time the committee makes independent expenditures aggregating \$1,000 or more after the 20<sup>th</sup> day, but more than 24 hours, before the day of the election. 2 U.S.C. § 434(g)(1), 11 C.F.R. § 104.4(c).

5. The FECA and regulations require political committees to file reports disclosing all financial activity for the reporting period and calendar year (or election cycle, in the case of an authorized committee of a candidate for federal office). This requirement mandates that a committee disclose all receipts received.
6. Respondents acknowledge an inadvertent violation of FECA relative to the 48-Hour and 24-Hour Reports. Respondents contend that “[w]ith regard to the independent expenditures and their disclosure on 24- and 48-Hour reports, the Committee has reviewed its records and concurs with the Commission’s interpretation. Action has been taken to educate staff and improve procedures to insure this does not happen in the future.”
7. Respondents assert that the Amended March Monthly Report was necessary due to a technical error that prevented some receipts from being entered into the Committee’s membership database, and subsequently into the Committee’s FEC reporting software.
8. Respondents, in an effort to avoid similar errors in the future, took proactive steps to ensure future compliance such as hiring an experienced outside compliance specialist, and engaging the services of a consultant to review FEC reporting procedures. In addition, the Committee agrees to: (a) pay a civil penalty of \$7,000; (b) develop a compliance desk manual for use by Committee staff; and (c) send a Committee representative to a FEC seminar within twelve months of the effective date of the agreement.
9. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
10. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may submit any unpaid civil penalty to the U.S. Treasury for collection, or undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
11. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms (a) and (b) in paragraph 8 above within thirty (30) days from the effective date of this agreement. Respondents shall comply with term (c) within twelve (12) months of the effective date of this agreement.
12. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 322 (RR 06L-09), and effectively resolves the issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

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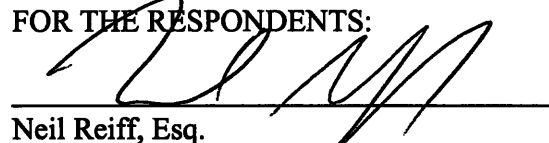
FOR THE COMMISSION:

Lynn M. Fraser  
Alternative Dispute Resolution Office



9/14/06  
Date Signed

FOR THE RESPONDENTS:

  
Neil Reiff, Esq.  
Representing the International Association of Firefighters  
Interested in Registration and Education PAC

8/30/06  
Date Signed

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