



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

March 19, 2014

David A. Warrington, Esq.  
LeClair Ryan  
2318 Mill Road, Suite 1100  
Alexandria, VA 22314

Re: ADR 703 (RR 13L-21)  
America's Liberty Political Action Committee and Elizabeth Newberry, Treasurer

Dear Mr. Warrington:

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 America's Liberty Political Action Committee 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 America's Liberty Political Action Committee and Elizabeth Newberry, 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:

The Reports Analysis Division referred America's Liberty Political Action Committee and Elizabeth Newberry, Treasurer (Respondents or the Committee) for failing to timely file one 24-Hour Report to support one independent expenditure totaling \$95,000 disclosed on the 2012 30 Day Post-General Report filed on December 5, 2012. On April 24, 2013, the Committee filed the 24-Hour Report to support this independent

expenditure which was disseminated on November 2, 2012 and disclosed on the 30 Day-  
Post General Report.

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 of receipt 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 703**. 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  
Assistant Director  
Alternative Dispute Resolution Office

Enclosures: ADR Frequently Asked Questions  
Commitment to Submit to ADR & Designation of Representative/Counsel