



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 16, 2022

Carrie Santoro, Treasurer
PA Stands Up Political Action
PO BOX 31995
Philadelphia, PA 19104

**Response Due Date
September 6, 2022**

Re: ADR 1084 (RAD 22L-19)
PA Stands Up Political Action and Carrie Santoro, Treasurer (C00743021)

Dear Treasurer:

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 PA Stands Up Political Action 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 PA Stands Up Political Action and Carrie Santoro, 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 (RAD) referred PA Stands Up Political Action and Carrie Santoro, Treasurer (Respondents or the Committee) for failing to disclose all financial activity on its 2020 12-Day Pre-General Report. On March 14, 2022, the Committee filed an Amended 2020 12-

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Day Pre-General Report which disclosed \$199,356.92 in additional receipts and \$72,173.44 in additional debts. Additionally, the Committee failed to timely file one (1) 48-Hour Report totaling \$72,173.44 to support two (2) independent expenditures disclosed in the Amended 2020 12-Day Pre-General Report. The Committee also failed to disclose all financial activity on the 2020 30-Day Post-General Report. On March 14, 2022, the Committee filed an Amended 2020 30-Day Post General Report which disclosed \$126,929.60 in additional receipts. The Committee also failed to timely file one (1) 24-Hour Report totaling \$89,410.59 to support one (1) independent expenditure disclosed in the Amended 2020 30-Day Post-General Report. The late 24-and 48-Hour Reports were filed on March 14, 2022. The Committee also failed to disclose all financial activity on the 2020 Year-End Report. On March 14, 2022, the Committee filed an Amended 2020 Year-End Report which disclosed \$161,687.39 in additional disbursements.

On April 20, 2022, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission), stating in part, "PA Stands Up Political Action submits that its actions in securing the services of a new compliance firm and then swiftly filing corrected versions of past reports found to contain inaccurate information and filing a missing 48 hour and 24 hour report shows that best efforts have been used to obtain, maintain, and submit the information required by this Act for the political committee."

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.

This matter has been designated as **ADR 1084**. 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,



Rosa Marshall
Assistant Director
Alternative Dispute Resolution Office