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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE**MEMORANDUM**

December 16, 2022

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Krista J. Roche *KJR*
Director, ADR Office

Rosa Marshall *RM*
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement
ADR 1084 - PA Stands Up Political Action and Carrie
Santoro, Treasurer (C00743021)

RESOLUTION TERMS: Certify annually for two years that the Committee continued
to retain the services of a compliance team; certify that a
representative of the Committee participated in an FEC
training program; and pay a civil penalty of \$29,000.

Attached for your review is a signed Negotiated Settlement pertaining to ADR 1084 (RAD 22L-19). The ADR Office received this referral from the Reports Analysis Division (RAD) on August 2, 2022.

SUMMARY: RAD referred PA Stands Up Political Action and Carrie Santoro, Treasurer (Respondents or the Committee) for the following issues:

Respondents failed to disclose all financial activity on the 2020 12-Day Pre-General Report¹. On March 14, 2022, the Committee filed an Amended 2020 12-Day Pre-

¹ On October 18, 2020, the Committee initially filed a November Monthly Report covering the period from October 1, 2020 through October 31, 2020. The report was subsequently amended on December 8, 2020, and filed as a 12-Day Pre-General Report, covering the period from October 1, 2020 through October 14, 2020, in accordance with the 2020 quarterly reporting schedule for political action committees.

General Report which disclosed \$199,356.92 in additional receipts and \$72,173.44 in additional debts.

Respondents 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 48-Hour Report was filed on March 14, 2022, albeit untimely.

Respondents 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.

Respondents 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 24-Hour Report was filed on March 14, 2022, albeit untimely.

Lastly, Respondents 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.

During negotiations, the Committee stated that after conducting an internal review, they discovered that past reports failed to accurately disclose all receipts, expenditures, and debts incurred by the political committee. The Committee retained the services of a compliance team to assist with the filing of amended reports. On March 14, 2022, the Committee filed the required 48-Hour, 24-Hour, and amended reports to correct the public record, albeit untimely.

RECOMMENDATIONS:

1. Approve the attached Negotiated Settlement of PA Stands Up Political Action and Carrie Santoro, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.