



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 25, 2023

Renata Strause, Esq.
815 16th St. NW
Washington, DC 20006

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

Dear Renata Strause, Esq.:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on January 11, 2023 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is disclosed below:

Type	Date Due
Certify Committee continued to retain the services of a compliance team	1/11/2024
Certify that a representative participated in an FEC training	1/11/2024
Certify Committee continued to retain the services of a compliance team	1/11/2025

Under the terms of the agreement, a civil penalty in the amount of \$29,000 is due on February 24, 2023. Kindly review the attached payment instructions for details on payment methods and the collection of unpaid debts.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our 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 Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

A handwritten signature in black ink that reads "Rosa Marshall". The signature is written in a cursive, flowing style.

Rosa Marshall
Assistant Director
Alternative Dispute Resolution Office

Enc: Payment Instructions
Compliance Chart
Negotiated Settlement

ADRO Civil Penalty Payment Instructions

You may remit payment by credit card, debit card, or ACH withdrawal from your bank account through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/adrpayment to be directed to Pay.gov's FEC ADR Payment form.

Unpaid Civil Penalties

Unpaid civil money penalties will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.



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WASHINGTON, D.C. 20463

Case Number: ADR 1084

Source: RAD 22L-19

Case Name: PA Stands Up Political Action

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (FEC or the 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 Renata Strause, Esq., representing PA Stands Up Political Action and Carrie Santoro, in the official capacity of Treasurer (the Committee or Respondents). It is understood that this settlement 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 enters into this settlement 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 guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this settlement with the Commission.
3. The Reports Analysis Division (RAD) referred Respondents for the following issues:
 - a. 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-General Report which disclosed \$199,356.92 in additional receipts and \$72,173.44 in additional debts.
 - b. 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.
 - c. 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.

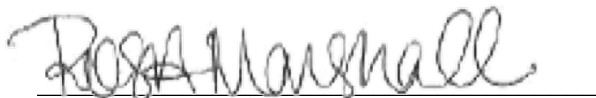
¹ On October 18, 2020, the Committee initially filed a November Monthly Report covering the period from October 1, 2020 through October 31, 2020. The report was subsequently amended on December 8, 2020 and filed as a 12-Day Pre-General Report covering the period from October 1, 2020 through October 14,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

- d. 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.
 - e. 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.
4.
 - a. Treasurers of political committees are required to report all financial activity, including all receipts, disbursements, and the amount and nature of outstanding debts and obligations owed by or to the political committee. 52 U.S.C. § 30104(b)(2), (4), (8); 11 C.F.R. § 104.3(a)-(b), (d).
 - b. A person, including a political committee, that makes or contracts to make independent expenditures aggregating \$10,000.00 or more at any time up to and including the 20th day before the date of an election shall file a report describing the expenditures within 48 hours. 52 U.S.C. § 30104(g)(2); 11 C.F.R. § 104.4(b)(2).
 - c. A person, including a political committee, that makes or contracts to make independent expenditures aggregating \$1,000.00 or more after the 20th day, but more than 24 hours, before the date of an election shall file a report describing the expenditures within 24 hours. 52 U.S.C. § 30104(g)(1); 11 C.F.R. § 104.4(c).
 5. Respondents state 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 firm to assist with filing amended reports containing fully accurate and reconciled financial data. On March 14, 2022, the Committee filed the required 48-Hour, 24-Hour, and amended reports to correct the public record, albeit untimely.
 6. Respondents, in an effort to avoid similar errors in the future, agree to:
 - a. certify annually for two years that the Committee continued to retain the services of a compliance team with the first certification due on the first anniversary of the effective date of this settlement, and the second certification due on the second anniversary of the effective date of this settlement;
 - b. certify that a representative of the Committee participated in an FEC conference, webinar, or other training program developed in consultation with the FEC's Information Division within twelve (12) months of the effective date of this settlement; and
 - c. pay a civil penalty of \$29,000 within thirty (30) days of the effective date of this settlement.
 7. 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 settlement under penalty of perjury pursuant to 28 U.S.C. § 1746.

8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance. Unpaid civil money penalties are subject to the Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. § 3701 et seq. The Commission will transfer debt to the United States Department of the Treasury (Treasury) for collection.
9. This settlement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this settlement as set forth above and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 1084 (RAD 22L-19), and resolves those issues identified above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:


Rosa Marshall, Assistant Director
Alternative Dispute Resolution Office



1/11/2023

Date Signed

FOR THE RESPONDENTS:



Renata Strause, Esq.
Representing PA Stands Up Political Action
and Carrie Santoro, Treasurer

12/9/22

Date Signed