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By Office of the Commission Secretary at 7:36 am, Apr 14, 2023

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463**SENSITIVE****MEMORANDUM**

April 14, 2023

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: Informational Memo on Assignment  
ADR 1106 - Pennsylvania United (C90017443)

The Reports Analysis Division (RAD) referred RAD 23L-12 for processing on April 12, 2023, and the ADR Office designated the referral ADR 1106. This office intends to notify Respondents after five business days. If you have any questions or concerns, please contact the ADR Office.

**Summary of Case:** RAD referred Pennsylvania United (the Respondent) for failing to file four (4) 48-Hour Reports totaling \$66,987.88 to support twenty (20) independent expenditures disclosed on the Amended 2020 October Quarterly Report. Additionally, on the 2020 Year-End Report, the Respondent disclosed eight (8) independent expenditures totaling \$111,463.86 with dates after the 2020 General Election that appear to be payment dates rather than the required dissemination dates.

RAD also referred the Respondent for failing to file one (1) 48-Hour Report totaling \$39,951.38 to support one (1) independent expenditure disclosed on the 2022 October Quarterly Report.

The Respondent did not disclose these expenditures on 24- or 48-Hour Reports.

On October 4, 2021, and December 5, 2022, the Respondent filed Form 99s (Miscellaneous Electronic Submissions) stating its failure to timely file the 24- and 48-Hour Reports was due to a misunderstanding of federal reporting requirements and an oversight by staff.