

23L-24

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: May 30, 2023

ANALYST: Jamie Curran

I. COMMITTEE: GALEO Impact Fund PAC
C00763433
Clara Elena Puerta Navarro, Treasurer
PO Box 29506
Atlanta, GA 30359

II. RELEVANT STATUTE: 52 U.S.C. §30104(g)(1)
11 C.F.R. §104.4(c)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)

GALEO Impact Fund PAC (“the Committee”) failed to timely file two (2) 24-Hour Reports to support two (2) independent expenditures totaling \$64,657.30 disclosed on the 2021 30-Day Post-Runoff Report made after the 20th day but more than 24 hours before the day of the 2021 Runoff Election and 2021 Special Runoff Election, both held January 5, 2021, in the state of Georgia (Attachment 1).

On January 25, 2021, the Committee filed the original [2021 30-Day Post-Runoff Report](#) covering the period from December 17, 2020 to January 25, 2021. The report did not disclose a [Schedule E \(Itemized Independent Expenditures\)](#).

On November 28, 2022, the Committee filed an Amended [2021 30-Day Post-Runoff Report](#). The report included a [Schedule E](#) disclosing eighteen (18) independent expenditures totaling \$120,964.77 made in support of two (2) Federal candidates.

On February 6, 2023, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the Amended 2021 30-Day Post-Runoff Report, received November 28, 2022. The RFAI noted the Committee may have failed to file two (2) or more of the required 24-Hour Reports of independent expenditures. A chart was included with the RFAI identifying six (6) independent expenditures totaling \$65,302.31, for which a 24-Hour Reports had not been filed¹ (Attachment 1).

On March 21, 2023, the Committee filed one (1) [24-Hour Report](#) to support the expenditures disclosed on the Amended 30-Day Post-Runoff Report, received November 28, 2022 (Attachment 1).

Since March 14, 2023, the Reports Analysis Division (RAD) logged three (3) communications with representatives of the Committee which reflect efforts to help the Committee voluntarily comply with the Act regarding the matters referenced above. RAD was able to connect with the Committee on two of these occasions and notified Clara Elana Puerto Navarro, Treasurer, that the matter could be referred to another Commission office for further review. RAD advised the Committee to file the missing 24-Hour Reports and an FEC Form 99 (Miscellaneous Electronic Submission) with any clarification for the public record (Attachment 2). To date, no further communications have been received from the Committee regarding this matter.

Filings and correspondence related to the Committee can be found here: [GALEO Impact Fund PAC](#).

¹ The chart attached to this RFAI included additional independent expenditures that are omitted from this referral as the threshold for filing a 24-Hour Report was not met per 11 C.F.R. § 104.4 (c).

GALEO Impact Fund PAC[2021 Amended 30-Day Post-Runoff Report, received 11/28/22](#)24-Hour Report Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported	Election	24-Hour Report Filed
ACTBLUE	12/20/20	\$2,557.30 <i>24-Hour Report Required</i>	OSSOFF, T. JONATHAN	Georgia-2021 Runoff (1/5/21)	3/21/23
Clear Channel Outdoor	12/30/20	\$62,100.00 <i>24-Hour Report Required</i>	WARNOCK, RAPHAEL	Georgia-2021 Runoff (1/5/21)	3/21/23