



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

August 10, 2024

Kayla Lott, Treasurer
Coalition for Fantasy Sports PAC
1501 Wilson Boulevard, Suite 1050
Arlington, VA 22209

Response Due Date
August 30, 2024

Re: ADR 1174 (RAD 24L-24)
Coalition for Fantasy Sports PAC and Kayla Lott, Treasurer (C00845131)

Dear Kayla Lott:

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 Coalition for Fantasy Sports PAC 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 Coalition for Fantasy Sports PAC and Kayla Lott, 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:

Coalition for Fantasy Sports PAC and Kayla Lott, Treasurer (Respondents or the Committee) failed to disclose all financial activity on its 2023 Year-End Report filed on January 25, 2024. On March 21, 2024, the Committee filed an Amended 2023 Year-End Report which disclosed \$112,500 in additional receipts and

\$26,400 in additional disbursements which were not disclosed in the original report.

On April 25, 2024, the Committee filed a Form 99 (Miscellaneous Electronic Submission), stating that the amended report disclosed additional activity for two reasons. First, the compliance officers did not initially have access to view the committee's bank accounts. Second, the Committee did not initially establish internal controls for monetary inflows, miscellaneous increases, or non-federal disbursements. Upon discovery, the missed transactions were immediately filed.

The Committee states it has since devised and implemented internal procedures to monitor and review inflows and miscellaneous increases, and to pre-clear disbursements. Further, the Committee has retained a reliable compliance firm and given them permission to view the Committees bank accounts to ensure the correct filing of these reports going forward.

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 1174**. 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

