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Federal Election Commission  
Washington, DC 20463

2006 SEP 15 A 9:29

**MEMORANDUM**

September 14, 2006

TO: The Commission

THROUGH: Patrina M. Clark  
Staff Director

*pnc*

**SENSITIVE**

FROM: Lynn M. Fraser, Acting Director  
Alternative Dispute Resolution Office

*lfr*

SUBJECT: ADR 345 Independent Action, Inc. and Ralph Santora, Treasurer,  
Recommendation to Assign

On August 31, 2006, the ADR Office received RAD 06L-24 to review and determine its appropriateness for ADR processing. Based on that review, we determined that the case is appropriate for ADR, and recommend that it be assigned to the ADR Office. The ADR Analysis includes an analysis of the case and a description of the issues that the ADR Office anticipates addressing if the case is assigned to ADR. In addition, the ADR Case Analysis Report has been reviewed by the Office of General Counsel, which concurs in the description of the case. If the Commission concurs in the recommendation, this case description will be provided to Respondents as part of ADR Office's notification package sent to Respondents.

**ADR Case:** ADR 345

**Source No.** RAD 06L-24

**Respondents:**  
Independent Action, Inc.  
Ralph Santora, Treasurer

**Respondents' Rep.:**  
Ralph Santora

**Complainant:** RAD

**Committee Name:** Independent Action, Inc.

**OGC Case Open Date:** --

**Committee Type:** Qualified Non-Party

**Date Forwarded to ADRO:** 8/31/06

**District #/or State:** --

**Election - Won/Lost:** --

**Election Cycle:** 2006

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**Summary of Complaint:** The Reports Analysis Division (“RAD”) referred Independent Action, Inc. and Ralph Santora, Treasurer, (“Respondents” or the “Committee”) for failing to disclose all financial activity on their 2005 Year End Report. Respondents filed their original 2005 Year End Report on January 31, 2006. The Committee filed an Amended 2005 Year End Report on February 22, 2006 that disclosed \$95,197.78 in additional disbursements. RAD sent a RFAI to the Committee on April 21, 2006 referencing the Amended 2005 Year End Report and the additional disbursements.

**Respondents’ Reply:** In reply to the RFAI, Respondents submitted an electronic submission on May 22, 2006 in which they stated “[b]ecause of the problems we were having with our data management company ... we were forced to make estimates based on bank totals in order to file our report in a timely manner. The problems we have had with our data management have been worked out, and their [sic] will be no further estimates or delays in our reporting.”

**RECOMMENDATION:**

- 1. Assign ADR 345/RAD 06L-24 to the ADR Office.**

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