



FEDERAL ELECTION COMMISSION
Washington, DC 20463

November 9, 2006

Ralph Santora
1619 13th Street, NW
Washington, DC 20009

Re: ADR 345 (RAD 06L-24)
Independent Action, Inc and Ralph Santora, Treasurer

Dear Mr. Santora:

The Reports Analysis Division of the Federal Election Commission ("FEC" or "Commission") determined that matters arising from its recent review of Independent Action, Inc.'s reports warranted further examination for possible violation of the Federal Election Campaign Act of 1971, as amended. The Commission, thereafter, reviewed the file and voted on September 20, 2006 to assign this matter to the FEC's Alternative Dispute Resolution Office ("ADRO") for processing.

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 The Independent Action, Inc and Ralph Santora, Treasurer ("Respondents" or the "Committee"). The ADR Program provides Respondents with an opportunity to negotiate, and if necessary, mediate 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 and/or mediation 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 Program, i.e., negotiation and/or mediation, you must: 1) indicate in writing a willingness to have your case submitted to the ADR process; 2) agree to participate in the bilateral negotiations and if necessary, mediation; 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:

Summary: 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

Federal Election Commission, Alternative Dispute Resolution Office
999 E Street N.W., Washington, DC 20463
Telephone: 202.694.1665 Fax: 202.219.0613
Email: lfraser@fec.gov

27190271179

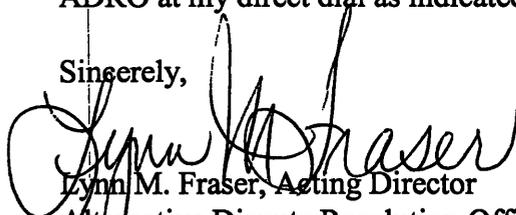
Year End Report on January 31, 2006. The Committee filed an Amended 2005 Year End Report on February 22, 2006 that disclosed \$95,197.78 in additional disbursements. RAD sent a RFAI to the Committee on April 21, 2006 referencing the Amended 2005 Year End Report and the additional disbursements.

In reply to the RFAI, Respondents submitted an electronic submission on May 22, 2006 in which they stated "because 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 there will be no further estimates or delays in our reporting."

If after reviewing this letter and the enclosed brochure, which describes the ADR program, Respondents would like this case selected for ADR processing, you need to affirmatively indicate that on the enclosed Commitment to Submit Matter to ADR Program form. **Failure to respond affirmatively within fifteen (15) business days of receipt 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, and the likelihood that the Committee will be audited during the next election cycle will increase.

This matter has been designated as ADR 345. 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,


Lynn M. Fraser, Acting Director
Alternative Dispute Resolution Office
202-694-1665

Enclosures: Brochure
Commitment to Submit Matter to ADR
Designation of Representative/Counsel