

REPORTS ANALYSIS DIVISION REFERRAL

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: March 26, 2019

ANALYST: Sarah Juris

I. COMMITTEE:

Win Justice
C00672394
Deepak Pateriya, Treasurer
1536 U Street NW
Washington, DC 20009

II. RELEVANT STATUTE:

52 U.S.C. § 30104(g)(2)
11 CFR § 104.4(b)(2)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Timely File 48-Hour Reports)

Win Justice (“the Committee”) failed to timely file one (1) 48-Hour Report totaling \$48,682.53 to support one (1) independent expenditure disclosed on the 2018 October Quarterly Report, made up to and including the 20th day before the 2018 General Election (Attachment 2).

On September 26, 2018, the Committee filed one (1) 48-Hour Report to support three (3) independent expenditures totaling \$163,280.93 disseminated between August 21, 2018 and September 14, 2018. The report disclosed one (1) late independent expenditure totaling \$48,682.53 disseminated on August 21, 2018 (Image 201809269124248206).

On October 15, 2018, the Committee filed its 2018 October Quarterly report, covering the period from July 1, 2018 through September 30, 2018. The report included a Schedule E (Itemized Independent Expenditures) disclosing ten (10) independent expenditures, totaling \$625,630.40, made in support of two (2) federal candidates (Images 201810159125193545 - 49).

On December 6, 2018, a Request for Additional Information (RFAI) was sent to the Committee referencing the 2018 October Quarterly Report. Among other items, the RFAI noted that the Committee may have failed to timely file one or more of the required 48-Hour Reports for independent expenditures disclosed on the report (Images 201812060300026431 - 33).

On January 10, 2019, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) in response to the RFAI referencing the 2018 October Quarterly Report. The Committee stated, in part:

“As indicated in Item 1 of the RFAI and the attachment to the RFAI, Win Justice did fail to file timely 48-hour reports for independent expenditures in support of Bill Nelson and Jacky Rosen. This error was an inadvertent result of an internal communication issue, and the committee has taken steps to prevent such errors in the future. These late-reported expenditures were for services and printing related to canvassing that started on the reported dissemination date and that was continued with additional canvassing in the days thereafter” (Image 201901109143785095).

Also on January 10, 2019, the Committee filed an Amended 2018 October Quarterly Report. The report disclosed no changes to Schedule E from the original report (Images 201901109143786032-36).

On February 5, 2019, the Reports Analysis Division (RAD) Analyst spoke with John Pomeranz, counsel for the Committee. The Analyst explained that the issue of late filed 48-Hour Reports questioned on the Committee’s 2018 October Quarterly Report may be referred for potential further action. After noting the Committee’s FEC Form 99 response, received January 10, 2019, the Analyst told Mr. Pomeranz that the Committee can file an additional statement for the public record if they wish to do so (Attachment 3).

To date, no further communications have been received from the Committee regarding this matter.

O-Index (2015-2016)											
Cmte. ID: C0067394 Cmte. Name: WIN JUSTICE											
Treasurer Name: PATERYA, DEEPAK Address: 1536 U ST NW, WASHINGTON, DC 20009											
Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER											
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Int#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb

No records were found for this cycle.

Win Justice (C00672394)
2018 October Quarterly Report, received 10/15/18

48-Hour Report Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported	Election	48-Hour Report Filed
Community Outreach Group, LLC	08/21/2018	\$48,682.53 <i>48-Hour Report Required</i>	Jacky Rosen	2018 General	9/26/2018