

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 20<sup>th</sup> 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 (RAI) was sent to the Committee referencing the 2018 October Quarterly Report. Among other items, the RAI 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 RAI referencing the 2018 October Quarterly Report. The Committee stated, in part:

“As indicated in Item 1 of the RAI and the attachment to the RAI, 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 (2019-2020)															
Comte. ID: C00672394					Comte. Name: WIN JUSTICE					Filing Frequency: QUARTERLY FILER					
Treasurer Name: PATERIYA, DEEPAK					Address: 1536 U ST NW, WASHINGTON, DC 20009					Comte. Designation: U (UNAUTHORIZED)					
Comte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)															
Form Tpl	Rpt Tp	A/I	Recpt Dt	Pgs	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Beg Cvg Dt	End Cvg Dt	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			1/10/2019	1	201901109143785095										
F24A	48		1/10/2019	3	201901109143786154										
Totals															
										\$0			\$0		

O-Index (2017-2018)															
Comte. ID: C00672394    Comte. Name: WIN JUSTICE															
Treasurer Name: PATERIYA, DEEPAK    Address: 1536 U ST NW, WASHINGTON, DC 20009															
Comte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE)    Comte. Designation: U (UNAUTHORIZED)    Filing Frequency: QUARTERLY FILER															
Form Tpl	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			11/29/2018	1	201811299133882976										
RQ2	48		10/25/2018	3	201810250300022688			10/25/2018							
RQ2	48		10/25/2018	3	201810250300022691			10/25/2018							
RQ2	Q3	N	12/6/2018	3	201812060300026431	7/1/2018	9/30/2018			\$0	\$3,000,000	\$15	\$2,999,985		\$0
F3XN	Q1	N	4/13/2018	6	201804139108028702	1/1/2018	3/31/2018		\$2,999,985	\$1,622,658	\$2,408,413	\$2,214,227			\$0
F3XN	Q2	N	7/14/2018	20	201807149115486280	4/1/2018	6/30/2018		\$2,214,227	\$3,694,767	\$4,100,312	\$1,808,683			\$0
F3XN	Q3	N	10/15/2018	48	201810159125193502	7/1/2018	9/30/2018		\$2,214,227	\$3,768,302	\$4,174,846	\$1,808,683			\$0
F3XA	Q3	A	1/10/2019	56	201901109143785981	7/1/2018	9/30/2018		\$2,214,227	\$3,768,302	\$4,174,846	\$1,808,683			\$432,166
F3XN	12G	N	10/25/2018	33	201810259133380342	10/1/2018	10/17/2018		\$1,808,683	\$1,359,559	\$1,173,285	\$1,994,957	\$432,166		\$432,166
F3XA	12G	A	1/10/2019	33	201901109143786037	10/1/2018	10/17/2018		\$1,808,683	\$1,359,559	\$1,173,285	\$1,994,957	\$432,166		\$432,166
F3XN	30G	N	12/6/2018	42	201812069135007588	10/18/2018	11/26/2018		\$1,994,957	\$2,258,554	\$3,747,973	\$505,538	\$0		\$0
F3XA	30G	A	1/10/2019	42	201901109143786102	10/18/2018	11/26/2018		\$1,994,957	\$2,258,554	\$3,747,973	\$505,538	\$0		\$0
F3XN	YE	N	1/31/2019	10	201901319144425376	11/27/2018	12/31/2018		\$505,538	\$0	\$315,612	\$189,928			\$0
F1N		N	3/6/2018	5	201803069095647622										
F1A		A	3/7/2018	4	201803079095650093										
F24N	48		9/12/2018	1	201809129121705309										
F24N	48		9/12/2018	1	201809129121705690										
F24N	48		10/10/2018	1	201810109124458139										
F24N	48		10/12/2018	1	201810129124534543										
F24N	48		10/15/2018	1	201810159125408771										
F24N	24		10/26/2018	9	201810269133547315										
F24N	24		10/27/2018	1	201810279133548658										
F24N	24		11/1/2018	2	201811019133576619										
F1A		A	3/21/2018	5	201803219097924722										
F24N	48		9/26/2018	1	201809269124248194										
F24N	48		9/26/2018	2	201809269124248206										
F24N	48		10/3/2018	3	201810039124284256										
F24N	48		9/18/2018	1	201809189121762598										
F24N	48		9/17/2018	1	201809179121729902										
F24N	48		10/7/2018	1	201810079124393867										
F24N	24		10/21/2018	1	201810219128312057										
F24N	48		10/17/2018	7	201810179125605642										
F24A	48		11/29/2018	3	201811299133882998										
F24A	48		11/29/2018	1	201811299133883001										
F24N	24		11/4/2018	1	201811049133587046										
Totals											\$12,010,072	\$11,820,146			

**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	<b>\$48,682.53</b> <i>48-Hour Report Required</i>	Jacky Rosen	2018 General	9/26/2018