

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: September 22, 2020

ANALYST: Scott Bennett

I. COMMITTEE: Perfect Together PAC, Inc.
C00719641
Theresa Mondella, Treasurer
P.O. Box 74
Summit, NJ 07902

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)

Perfect Together PAC, Inc. (“the Committee”) failed to timely file one (1) 48-Hour Report totaling \$26,000.00 to support one (1) independent expenditure disclosed on the 2020 April Quarterly Report, made up to and including the 20th day before the 2020 Primary Election held in the state of New Jersey (Attachment 2).

On April 15, 2020, the Committee filed its 2020 April Quarterly Report covering the period from January 1, 2020 through March 31, 2020. The report included a Schedule E (Itemized Independent Expenditures) disclosing one (1) independent expenditure, totaling \$26,000.00, made in support of one (1) Federal candidate (Image 202004159216849299).

On May 27, 2020, a Request for Additional Information (RFAI) was sent to the Committee referencing the 2020 April Quarterly Report. The RFAI noted that the Committee may have failed to file one (1) or more of the required 48-Hour Reports regarding independent expenditures disclosed on the report. A chart was included with the RFAI identifying one (1) independent expenditure, totaling \$26,000.00, for which a 48-Hour Report had not been filed (Image 202005270300071841-3, Attachment 2).

On May 28, 2020, Theresa Mondella, the Committee Treasurer, called and left a voicemail indicating she had questions about the RFAI sent on the 2020 April Quarterly Report. The Reports Analysis Division (RAD) Analyst returned the call and left a voicemail providing their direct number and office hours (Attachment 3).

On June 30, 2020, Ms. Mondella called and spoke with a RAD Analyst. Ms. Mondella acknowledged that the 48-Hour Report in question on the 2020 April Quarterly Report had not been filed and stated she would file it that day (Attachment 3).

Also on the same day, the Committee filed one (1) 48-Hour Report to support one (1) independent expenditure, totaling \$26,000.00, disbursed¹ on January 23, 2020 (Image 202006309244226163).

On July 1, 2020, Ms. Mondella called the RAD Analyst and inquired about responding to the RFAI sent on the 2020 April Quarterly Report. The Analyst advised Ms. Mondella to submit the missing report; she explained it had recently been filed. The Analyst advised that the issue described in the RFAI may be referred to another office for potential further action (Attachment 3).

On July 8, 2020, the RAD Analyst contacted Ms. Mondella and explained that the 48-Hour Report had not been timely filed and may be referred to another Commission office for potential further action. The Analyst invited the Committee to submit any supporting or clarifying information to the Commission in the form of an FEC Form 99 (Miscellaneous Electronic Submission). Ms. Mondella stated human error was the reason the report was not submitted, and that she would speak with other staff to decide whether to submit any supporting information (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

¹ The Committee did not provide a dissemination date on the 48-Hour Report or Schedule E of the Form 3X.

Perfect Together PAC, Inc. (C00719641)

2020 April Quarterly Report, received 4/15/2020

48-Hour Report Not Timely Filed

Name of Payee	Date of Disbursement (Schedule E)	Expenditure Amount	Candidate Supported	State and Date of Election	48-Hour Report Filed
National Research, Inc.	1/23/2020	\$26,000.00 <i>48-Hour Report Required</i>	KEAN, THOMAS H. JR.	New Jersey – 2020 Primary (7/7/2020)	6/30/2020