

June 10, 2021

Via Electronic Mail: [cela@fec.gov](mailto:cela@fec.gov)

Federal Election Commission  
Office of Complaints Examination  
& Legal Administration  
Attn: Christal Dennis, Paralegal

Re: RR 21L-33

Dear Ms. Dennis:

I am writing in response to correspondence from the Federal Election Commission indicating that the Reports Analysis Division referred Just the Truth Political Action Committee (C00747097) of which I am the Treasurer to the Office of General Counsel for possible enforcement action for failing to file timely 48-Hour Reports for Independent Expenditures as reported on the 2020 October Quarterly Report and the 2020 12-Day Pre-General Report.

On December 20, 2020, the Committee received a Request for Additional Information (RFAI) indicating the failure to file 48-Hour Reports for independent Expenditures reported on the 2020 October Quarterly Report. I spoke with our Reports Analyst at that time and, upon her advice, subsequently filed delinquent 48-hour reports for IE's disclosed on the 2020 October Quarterly report as well as reports filed in the intervening period which included the 2020 12-Day Pre-General Report. The Analyst indicated at that time that it was possible that additional, automatically generated RFAI's may follow that should be addressed by responding with a Form 99 indicating the resolution of the error by the Committee. This was indeed the case as on February 11, 2021, the Committee received an RFAI referencing the 2020 12-Day Pre-General Report. On March 10, a Form 99 response to the RFAI was filed. On April 22, 2021, a newly assigned Reports Analyst left a voicemail indicating failure to respond to the February 11, 2021, RFAI. On April 26, 2021, the Analyst returned the call to confirm the receipt of the March 10 Form 99. In each case of the Committee receiving an RFAI, we have addressed the matter concerned within according to the timeframe allotted.

As indicated in each Form 99 filed, the error to file timely 48-hour reports was an unintended negligence and-in no way-done with malice or forethought. When the mistake was realized, the Committee filed each of the negligent reports. Now aware of the statutory reporting requirements, we have altered procedures to ensure delinquent reporting of IE's does not happen in the future. These include drafting a 48-hour report at the end of each day that disbursements are made, which ensures accurate reporting.

We hope to maintain open communication with our Reports Analyst and/or whomever the appropriate parties are to resolve this matter.

Sincerely,

Jodi L. Schwartz  
Treasurer  
Just the Truth PAC