

23L-34

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: July 5, 2023

ANALYST: Michael Dobi

- I. ENTITY: Catholicvote.org
C90011800
Joseph Vanderhulst,
Attorney PO Box 259837
Madison, WI 53725
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(c)
52 U.S.C. § 30104(g)(1)
11 CFR § 109.10

III. BACKGROUND:

Failure to Independent Expenditure Reporting Problems – Persons Other Than Political Committees (Form 5) (Failure to Timely File 24-Hour Reports)

Catholic Vote failed to timely file one (1) 24-Hour report totaling \$300,000.00 to support three (3) independent expenditures disclosed on the 2022 Year-End Report, made during the reporting period up to and including the 20th day before the 2022 General Election (Attachment 1).

2022 Year-End Report

On January 31, 2023, Catholic Vote filed its [2022 Year-End Report](#) covering the period from October 1, 2022 through December 31, 2022. [Schedule 5-E \(Itemized Independent Expenditures\)](#) of the report disclosed twenty (20) independent expenditures totaling \$345,312.20, made in support of six (6) federal candidates and in opposition to six (6) federal candidates.

On February 27, 2023, a [Request for Additional Information \(RAI\)](#) was sent to Catholic Vote referencing the 2022 Year-End Report. The RAI noted Catholic Vote may

have failed to timely file a 24-Hour Report for three (3) independent expenditures disclosed on Schedule 5-E.

On April 20, 2023, Catholic Vote filed a [24-Hour Report](#) with the missing independent expenditures and included miscellaneous text stating²:

“This amendment is filed in response to the Request for Additional Information dated 27 Feb. 2023 indicating that a 24-hour report had not been timely filed for the independent expenditures included in this filing. According to the analyst, the original 24-hour report that was filed by the organization on 7 Nov. 2022 shows up as blank in the FEC's database. All of our records and receipts, however, indicate that the 24-hour report was timely filed with complete information. Our FECfile datafile includes the full details entered into the report and the verification did not list any errors and we did not receive any fail errors from FECfile. We created a print preview of the 24-hour report before filing that includes all of the information pertaining to the independent expenditures on this report and is not blank. We have a copy of this print-out that shows the date and time it was created. And we received an email receipt on 7 Nov. 2022 showing proof of filing after we uploaded the report through FECfile. We followed all instructions for filing provided in the FECfile Manual and had no way of knowing that the report shows up as blank in the FEC's database. The original filing assigned ID FEC-1660893.”

Since April 6, 2023, RAD logged three (3) communications with Catholic Vote which reflect efforts to help the entity voluntarily comply with the Act. RAD was able to connect with the entity's attorney, Joseph Vanderhulst, on two (2) of these occasions and notified him that the matter would be referred to another office at the Commission for further review. Mr. Vanderhulst stated that Catholic Vote had electronically filed the missing 24-Hour Report on November 7, 2022, and received a confirmation receipt email. He also confirmed the independent expenditures appeared correctly in the entity's reporting software. RAD confirmed the November 7, 2022, filing was received, but explained it contained no transactions (Attachment 2).

Filings and correspondence related to the entity can be found here: [Catholicvote.org](https://catholicvote.org). To date, no further communications have been received from Catholic Vote regarding this matter.

² On November 7, 2022, Catholic Vote filed a [24-Hour Report](#) disclosing \$0.00 in independent expenditures.

Catholicvote.org (C90011800)
[2022 Year-End Report](#)

24-Hour Report Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported	Election	24-Hour Report Filed
Majority Strategies	11/6/2022	\$41,500.00 <i>24-Hour Report Required</i>	Adam Laxalt	2022 General	4/20/2023
Majority Strategies	11/6/2022	\$93,500.00 <i>24-Hour Report Required</i>	Blake Masters	2022 General	4/20/2023
Majority Strategies	11/6/2022	\$165,000.00 <i>24-Hour Report Required</i>	J.D. Vance	2022 General	4/20/2023