



THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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**SENSITIVE**

**MEMORANDUM**

April 13, 2007

TO: The Commission

THROUGH: Patrina M. Clark *pmc*  
Staff Director

FROM: Margarita Maisonet *mm*  
Chief Compliance Officer

Deborah Kant *DK*  
Director, ADR Office

BY: Lynn M. Fraser *lmf*  
Assistant Director, ADR Office

SUBJECT: ADR 345 Independent Action, Inc. and Ralph Santora, Treasurer,  
Recommendation to Approve Settlement Agreement

RESOLUTION TERMS: Attend FEC seminar and develop compliance manual

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 345 (RAD 06L-24)**. This case was opened on September 1, 2006, and was assigned to the ADR Office on September 20, 2006.

**SUMMARY:** RAD referred Independent Action, Inc. and Ralph Santora, Treasurer, ("Respondents" or the "Committee") for failing to disclose all financial activity on their 2005 Year End Report. Respondents filed their original 2005 Year End Report on January 31, 2006. The Committee filed an Amended 2005 Year End Report on February 22, 2006 that disclosed \$95,197.78 in additional disbursements.

Respondents contend that the additional disbursements reported occurred due to problems the Committee had with its data management company. Respondents were forced to make estimates based on bank totals in order to file its report in a

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timely manner. Respondents further contend that the amended report, with the corrected disbursements, was filed three weeks after the original report.

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Independent Action, Inc. and Ralph Santora, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.