

23L-03

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: February 14, 2023

ANALYST: Nick Tarone

- I. COMMITTEE: Results for NC, Inc.  
C00545152  
Charles Gantt, Treasurer (4/28/22 – Present)  
Katherine Reynolds, Treasurer (1/12/21 –  
4/27/22)  
P.O. Box 28634  
Raleigh, NC 27611
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(g)(1)  
11 C.F.R. § 104.4(c)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to File and Timely File 24-Hour Reports)**

Results for NC, Inc. (“the Committee”) failed to file one (1) 24-Hour Report and failed to timely file one (1) 24-Hour Report to support two (2) independent expenditures totaling \$74,950.00 disclosed on the 2022 July Quarterly Report, made after the 20th day but more than 24 hours before the day of the 2022 North Carolina Primary Election held on May 17, 2022 (Attachment 1).

On May 17, 2022, the Committee filed one (1) [24-Hour Report](#) to support one (1) independent expenditure, totaling \$70,000.00, disseminated on May 9, 2022.

On July 12, 2022, the Committee filed its [2022 July Quarterly Report](#), covering the period from April 28, 2022, through June 30, 2022. The report included a [Schedule E](#)

[\(Itemized Independent Expenditures\)](#) disclosing twenty-five (25) independent expenditures, totaling \$1,204,719.56, made in support of or opposition to two (2) Federal candidates.

On August 14, 2022, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the 2022 July Quarterly Report. The RFAI noted that the Committee may have failed to file and failed to timely file one or more of the required 24-Hour Reports regarding independent expenditures. A chart was included with the RFAI identifying one (1) independent expenditure totaling \$4,950.00, for which one (1) required 24-Hour Report had not been filed and one (1) independent expenditure totaling \$70,000.00, for which one (1) required 24-Hour Report had not been timely filed.

On August 19, 2022, the Committee filed an [FEC Form 99 \(Miscellaneous Electronic Submission\)](#) in response to the RFAI referencing the 2022 July Quarterly Report. The Form 99 stated, in part:

“This statement is in response to the Commission's letter dated August 14, 2022 regarding a 48 Hour Report that was not filed and another 48 Hour Report that was filed late for independent expenditures disclosed on Schedule E of the Committee's above referenced report.

For the first expenditure, the Committee was transitioning to a new compliance and treasury vendor. Despite the Committee's best efforts during the transition, one of the Committee's vendors never updated its records for the Committee's compliance team contact information. Because of this, the compliance team never received the information needed to file this 48 Hour Report.

The other referenced expenditures were filed late due to a miscommunication. As soon as the Committee was aware of the error, the Committee immediately filed the 48 Hour Report. Although the report was late, it was still filed before the Primary Election<sup>2</sup>, which gave the Commission and the public time to review it.

The Committee has reviewed and improved its procedures and internal communication to prevent similar errors in the future.”

Since October 5, 2022, the Reports Analysis Division (RAD) Analyst logged two (2) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act. The RAD Analyst notified Charles Gantt, the Committee's Treasurer, that the Committee may be referred to another Commission office regarding the matters referenced above. The RAD Analyst advised the Committee they could file an FEC Form 99 to provide any additional information on the public record

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<sup>2</sup> The 48-Hour Report was filed on the day of the Primary election, May 17, 2022.

RAD Referral 23L-03

Results for NC, Inc.

Page 3 of 3

involving this matter (Attachment 2). To date, no further communications have been received from the Committee regarding this matter.

Filings and correspondence related to the Committee can be found here:

[Results for NC, Inc.](#)

**Results for NC, Inc. (C00545152)**  
[2022 July Quarterly Report](#), received July 12, 2022

24-Hour Report Not Filed

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Opposed</b>	<b>State and Date of Election</b>
WINNING ENDEAVORS, LLC	5/2/2022	<b>\$4,950.00</b> <i>24-Hour Report Required</i>	CAWTHORN, DAVID MADISON	2022 NC Primary (5/17/2022)

**Results for NC, Inc. (C00545152)**[2022 July Quarterly Report](#), received July 12, 202224-Hour Report Not Timely Filed

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Supported</b>	<b>State and Date of Election</b>	<b>24-Hour Report Filed</b>
ADVANTAGE INC.	5/9/2022	<b>\$70,000.00</b> <i>24-Hour Report Required</i>	EDWARDS, CHUCK	2022 NC Primary (5/17/22)	5/17/2022