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NAME OF COMMITTEE (In Full)
WIN JUSTICE

FEC IDENTIFICATION NUMBER
C00672394

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WASHINGTON DC 20009

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September 15, 2021

Maggie Hanna, Campaign Finance Analyst, Reports Analysis Division
Federal Election Commission
1050 First Street, NE
Washington, DC 20463
ELECTRONICALLY FILED

RE: Win Justice, Committee ID: C00672394;
8/12/2021 RFAI regarding Amended 30 Day Post-General Report, Filed 1/04/2021

Dear Ms. Hanna,

I am writing as counsel to Win Justice (Committee) in response to your August 12, 2021 request for additional information (RFAI) related to the Amended 30 Day Post-General Report filed by the Committee on January 4, 2021 (Amended Post-General Report).

The Committee acknowledges that it failed to timely report certain independent expenditures in support of Joseph R. Biden, as indicated in the first numbered paragraph of the RFAI and the attachment titled Late 24 Hour Report (Schedule E). Each of these items was the result of an oversight later identified by the Committee, and each was disclosed on the Post-General Report and on late 24-hour reports filed after the error was discovered. More details about the particulars of these late reports follow below:

? The entries on Lines 1 and 2 of the attachment titled Late 24 Hour Report (Schedule E) relate to amounts the Committee paid to Solidarity Strategies, LLC for television and radio ads supporting Biden. The Committee initially contracted for these ads on September 2, 2020, making an advance payment of \$50,000 on that date. The first ad ran on September 23, 2020, and the Committee filed a timely 48-hour report on September 25, 2020, reporting \$50,000 payment as an independent expenditure in support of Biden (FEC- 1441441). The Committee also timely reported an additional \$9,750 payment to Solidarity Strategies, LLC for production costs associated with the ad that began running on September 23, 2020 (FEC- 1441440). Additional ads began airing in support of Biden on October 19, 2020 and October 23, 2020, as part of of the \$50,000 expenditure earlier reported on FEC-1441441. Subsequently, the Committee received an invoice from Solidarity Strategies, LLC for additional production costs associated with those ads, and due to an oversight the Committee failed to timely report these additional production costs. The Committee later determined that \$2,600 of the additional cost was attributable to the ad that began airing on October 19, and \$7,500 was attributable to the ad that began airing on October 23. The Committee discovered this oversight in the course of preparing its Post-General Report and filed late 24-hour reports reflecting these additional expenditures on December 21, 2020.

? The entry on Line 3 of the attachment titled Late 24 Hour Report (Schedule E) relates to a payment of \$23,398.32 to the Committee made to Sisneros Strategies, LLC on October 20 for a mailing to be distributed at a future date. That mailing was ultimately distributed on October 31, and was allocable on an equal basis to Joe Biden and a nonfederal candidate. This expenditure should have been disclosed on a 24-hour report filed on or before November 1, but was not reported due to an oversight. The Committee discovered this oversight in the course of preparing its Post-General Report and disclosed the \$11,699.16 independent expenditure in support of Biden on that report, as well as on a late 24-hour report filed on December 21.

The Committee also acknowledges certain discrepancies between certain 24-hour reports of independent expenditures filed