

AGENDA DOCUMENT NO. 24-21-A

AGENDA ITEM

For the hearing of May 16, 2024

SUBMITTED LATE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

May 14, 2024

MEMORANDUM

TO: The Commission

FROM: Neven F. Stipanovic *NFS*
Associate General Counsel, Policy Division

Jessica Selinkoff *JS*
Assistant General Counsel, Compliance Advice

Margaret J. Forman *MJF*
Attorney

Joshua Blume *JB*
Attorney

SUBJECT: Mike Pence and Mike Pence for President – Date of Ineligibility (LRA 1194)

The Audit Division has separately circulated for Commission consideration a memorandum recommending that the Commission determine that Mike Pence and Mike Pence for President (“MPFP”) are eligible to receive matching fund payments under the Presidential Primary Matching Payment Account Act, 26 U.S.C. §§ 9031-42 (“Matching Payment Act”). The Office of the General Counsel (“OGC”) recommends that, if the Commission determines that Mr. Pence and MPFP are eligible to receive matching funds and certifies to the Secretary of Treasury the initial \$100,000 matching payment,¹ the Commission, at the same time, take two additional actions outlined in this memorandum.

First, OGC recommends the Commission determine that Mr. Pence’s date of ineligibility (“DOI”) is October 28, 2023, the date he publicly announced that he was suspending his campaign.² Second, OGC recommends that the Commission approve notification to Mr. Pence

¹ See 11 C.F.R. § 9036.1(c)(2).

² See 26 U.S.C. § 9033(c) (setting forth general rule for termination of payments and limitations on payments after ineligibility); 11 C.F.R. §§ 9033.5, 9033.6 (determination of DOI).

and MPFP of the DOI determination with (1) an instruction to submit a statement of net outstanding campaign obligations (“NOCO”) within 15 calendar days of the DOI determination³ and (2) a notification that the portion of the \$100,000 payment attributable to matched contributions that were received after the DOI may be used for only the limited purpose of defraying NOCO, plus estimated necessary winding down costs.⁴

I. Determination of Date of Ineligibility

As relevant here, Mr. Pence reached his DOI on the date he “publicly announce[d] that he . . . will not be actively conducting campaigns in more than one State.”⁵ Accordingly, OGC recommends the Commission determine Mr. Pence’s DOI to be October 28, 2023, the date of the candidate’s public announcement.⁶

On October 28, 2023, Mr. Pence publicly announced, “I have decided to suspend my campaign for president effective today.”⁷ In the same speech, Mr. Pence made several statements that indicated that he was no longer actively campaigning: “this is not my time,” “I’m leaving this campaign,” and “as we leave this campaign we do so with grateful hearts.”⁸

As late as December 28, 2023, while OGC was assessing the legal sufficiency of Mr. Pence’s candidate and committee agreements and certifications, including the certification that Mr. Pence was, at the time of certification, a “candidate” who “is seeking” nomination by a political party for election to the office of president,⁹ Mr. Pence and MPFP contended in their December 28 response that Mr. Pence still remained a candidate, and they have not indicated any

³ See 11 C.F.R. § 9034.5(a) (requiring and setting time for submission of NOCO statement).

⁴ See 26 U.S.C. § 9033(c)(2) (specifying use of post-eligibility (or DOI) payments); 11 C.F.R. §§ 9034.1(b), 9034.5(a) (providing more detailed determination of NOCO and post-DOI entitlement).

⁵ *Id.* § 9033.5(a)(1). In addition to the public announcement date, paragraph 9033.5(a) provides for two alternative DOIs based on inactive candidacy. See *id.* § 9033.5(a)(2)-(3) (date of written notice that not actively campaigning in more than one state, or date no longer actively seeking election in more than one state under § 9033.6); see also *id.* § 9033.5(b)-(c) (providing that the Commission also may determine DOI when a candidate has received insufficient primary election votes or when the matching payment period ends). However, it is the date of public announcement that applies here because § 9033.5(a) requires the Commission to use the earliest of the three possible dates in paragraph 9033.5(a) when determining a candidate is no longer actively seeking the nomination.

⁶ 11 C.F.R. § 9033.5(a)(1).

⁷ Mike Pence (@Mike_Pence), X (Oct. 28, 2023, 6:14 PM) at 0:48, https://twitter.com/Mike_Pence/status/1718390807949189137 (“Pence Announcement Tweet”) (including video of speech) (last visited May 2, 2024); Mike Pence, *Thank You, God Bless You, and God Bless America!*, Mike Pence for President, <https://mikepence2024.com/thank-you-and-god-bless-you-and-god-bless-america/> (last visited May 2, 2024) (same).

⁸ Pence Announcement Tweet at 0:40, 2:47, 0:56, and 4:35, https://twitter.com/Mike_Pence/status/1718390807949189137.

⁹ See 26 U.S.C. § 9033(b)(2); 11 C.F.R. § 9033.2(b)(1).

change in that position.¹⁰ After reviewing publicly available information, however, OGC has found little evidence that would indicate Mr. Pence is actively conducting his campaign. OGC is not aware of a public appearance in which Mr. Pence indicated his candidacy was active or ongoing in the two months after publicly announcing the suspension of his campaign. To the contrary, approximately two weeks after Mr. Pence publicly announced the suspension of his campaign, he again publicly stated that he was “departing from the campaign trail and from active politics.”¹¹ In a later public appearance, Mr. Pence referred to his campaign seeking the presidential nomination in the past tense.¹² In two other instances when an interviewer turned to Mr. Pence’s suspended campaign or the election, Mr. Pence expressed the need for “new” or “different” leadership, without naming himself as that potential leadership.¹³ In fact, OGC is aware of no information suggesting that Mr. Pence has made public statements indicating his active candidacy since his October 28, 2023, announcement.¹⁴

¹⁰ See Letter from Michelle Reisner, Treasurer, Mike Pence for President to Commissioners, FEC, Supplemental Letter in Support of Candidate’s 9033 Letter (Dec. 28, 2023) (“Dec. 28, 2023, Letter”). Mr. Pence and MPFP were responding to an inquiry Commission staff made in early November about whether he could still maintain his certification that he was an active candidate in the context of establishing eligibility, and Mr. Pence and MPFP were contending as late as December 28 that he was *at that time* actively seeking the nomination. Mr. Pence and MPFP have not withdrawn that contention but elected “to stand on its prior submissions” on January 11 when responding to Commission staff’s follow up on December 29. See Letter from Michelle Reisner, Treasurer, Mike Pence for President to Commissioners, FEC, Supplemental Letter in Support of Candidate’s 9033 Letter (Jan. 11, 2024). These contentions were made prior to the Commission’s treatment of October 12, 2023, as the operative date due to the technical errors in the October 12, 2023, certifications that matched the same errors in an outdated template available on the Commission’s website. See *infra*, n. 27. However, because MPFP never explicitly withdrew its contention that Mr. Pence remained an active candidate, we address it here.

¹¹ Mike Pence (@Mike_Pence), X (Nov. 14, 2023, 11:56 AM), https://twitter.com/Mike_Pence/status/1724471327946391746 (embedding video of Mr. Pence’s appearance on the Brian Kilmeade show, at 4:11).

¹² See *Pence: January 6 was ‘a riot that should never have happened,’* CNN, <https://www.cnn.com/videos/politics/2024/01/07/sotu-pence-full-interview.cnn> (last visited May 2, 2024) (“CNN Pence Interview”) (answering question at 9:00 about endorsement of a remaining candidate in Iowa, Mr. Pence stated that he has “been speaking with several of my old competitors” before explaining why “I *ran* for president” (emphasis added)).

¹³ See, e.g., Mike Pence (@Mike_Pence), X (Dec. 1, 2023, 10:39 AM), https://twitter.com/Mike_Pence/status/1730612622582514151 (linking to Tudor Dixon Podcast at <https://podcasts.apple.com/us/podcast/the-tudor-dixon-podcast-family-values-with-mike/id1678556326?i=1000636629102> where, approximately at 39:05 in response to being asked if he will “run again for president,” Mr. Pence did not indicate that he was still running and stated “we like to say at our house” that “we don’t know what the future holds”), CNN Pence Interview (showing, at 9:42, Mr. Pence answered question about who he will endorse for president by saying “we certainly need new leadership in the White House”); Sky News, *Mike Pence: ‘American people open to new leadership,’* YOUTUBE (Jan. 7, 2024), <https://www.youtube.com/watch?v=ZrC-MAGWjLg> (stating at 0:47, “the American people are open to new leadership”).

¹⁴ MPFP’s website also lists no campaign events after October 17, 2023, and no upcoming events. See *Events*, Mike Pence for President, <https://mikepence2024.com/events/> (last visited May 14, 2024); see also *The Latest*, Mike Pence for President, <https://mikepence2024.com/the-latest/> (showing the most recent update on “The Latest” page to be a Fox News appearance on October 11, 2023).

In the December 28 letter, Mr. Pence and MPFP stated that the “continuation of solicitations for campaign contributions, the existence of campaign expenditures, and the retention of the candidate’s supporters” indicated that Mr. Pence remained a candidate as of that date. Mr. Pence, however, did not provide any specific information as to his and MPFP’s solicitations for campaign contributions, campaign expenditures, or retention of staff and volunteers.¹⁵ In terms of solicitations for contributions, other than the continuing presence of a “contribute” link in the header of the existing MPFP campaign website, since October 28, 2023, OGC is not aware of Mr. Pence or MPFP actively seeking contributions in his campaign for presidential nomination.¹⁶ In the December letter, Mr. Pence and MPFP acknowledge that Mr. Pence “reduce[d] the size of his campaign staff” after suspending his campaign, but provide no information as to whether MPFP continues to employ campaign staff beyond its treasurer.¹⁷

Moreover, the fact that Mr. Pence publicly announced his decision to “suspend” and “leave” his campaign, rather than use the exact language (“not be actively conducting campaigns in more than one state”) used in 11 C.F.R. § 9033.5(a)(1) is not legally relevant. In a previous public financing matter, the Commission determined Senator Paul Simon’s DOI on the basis of Sen. Simon publicly announcing, “I am today suspending my campaign for the presidency,” and “I leave the field of active campaigning with no regrets....”¹⁸

Mr. Pence and Sen. Simon’s public announcements communicate fundamentally the same message in almost identical words. Both candidates’ announcements use the words “suspend” — with Mr. Pence saying “suspend ... today” while Sen. Simon says “today suspending” — and “leave,” with Mr. Pence saying “leaving this campaign” and “leave this campaign” while Sen. Simon says “leave the field of active campaigning.” Mr. Pence’s

¹⁵ See Dec. 28, 2023, Letter; 11 C.F.R. § 9033.6(b)(2), (3), (6) (noting the factors for determining, under paragraph 9033.5(a)(3), when a candidate was no longer actively seeking nomination, including solicitations and expenditures; staff and volunteers; and urging supporters to support another candidate, respectively).

¹⁶ See Mike Pence for President, <https://mikepence2024.com/> (last visited May 14, 2024). A search of MPFP’s disclosure reports reveals no definitive activity of solicitations. Though MPFP has disclosed contributions, nothing on the reports reveals that such contributions were made in response to any associated solicitations. MPFP disclosed direct mail activity, including for the purpose of “postage,” and “printing,” but this does not necessarily indicate that this mail activity was soliciting contributions. See e.g., MPFP Feb. 2024 Monthly Report at 197, 198 (February 20, 2024), <https://docquery.fec.gov/pdf/876/202402209619880876/202402209619880876.pdf> (disclosing disbursements for printing, “direct mail consulting/list rental/database services/printing/postage,” postage); MPFP March 2024 Monthly Report at 234, 240-244 (Mar. 20, 2024), <https://docquery.fec.gov/pdf/089/202403209624802089/202403209624802089.pdf> (disclosing disbursements for postage, direct mail consulting, “direct mail consulting/printing/post, printing/post,” “direct mail consulting/printing/data”); MPFP Apr. 2024 Monthly Report at 287-289, 296-301 (Apr. 20, 2024), <https://docquery.fec.gov/pdf/572/202404209633643572/202404209633643572.pdf> (disclosing disbursements for “direct mail consulting/database services/list rental,” postage, direct mail consulting, “direct mail consulting/printing/post, printing/post,” “direct mail consulting/printing/data”).

¹⁷ See Dec. 28, 2023, Letter.

¹⁸ See Vote Certification, Re: Notification of Date of Ineligibility – Sen. Paul Simon (Apr. 15, 1988); Letter from Thomas J. Josefiak, Chairman, FEC, to Hon. Paul Simon, Notification of Date of Ineligibility (Apr. 15, 1988); *Simon Withdrawal*, C-SPAN at 01:18 (Mar. 7, 1988), <https://www.c-span.org/video/?2121-1/simon-withdrawal>.

statement two weeks later that he was “departing from the campaign trail and from active politics” further clarifies that he was no longer actively campaigning in any state.

OGC concludes that Mr. Pence ceased to be a candidate when he publicly announced he was suspending his campaign and, therefore, that Mr. Pence was no longer actively conducting campaigns in more than one state in connection with seeking the presidential nomination as of the date of that announcement on October 28, 2023. Accordingly, OGC recommends the Commission determine that October 28, 2023, is Mr. Pence’s DOI under 26 U.S.C. § 9033(c) and 11 C.F.R. § 9033.5(a)(1).¹⁹

II. Notification to Mr. Pence and MPFP

The Matching Payment Act and Commission regulations allow a candidate to receive post-DOI payments for a limited purpose; after DOI, a candidate “may only receive matching payments to the extent that he or she has net outstanding campaign obligations.”²⁰ The NOCO is “a formula for computing a candidate’s financial status at the date of ineligibility. Under this formula, the campaign’s obligations for qualified campaign expenses including winding down costs are balanced against total of the campaign’s cash on hand, the value of capital assets, and amounts owed to the campaign.”²¹ All expenditures included in the NOCO must be “for qualified campaign expenses as of the candidate’s date of ineligibility.”²²

A candidate must submit a NOCO statement to the Commission within 15 calendar days after the candidate’s DOI, as determined under 11 C.F.R. § 9033.5.²³ “Candidates will be notified of their DOI by the Commission.”²⁴ We therefore recommend that the Commission approve the appropriate letter notifying Mr. Pence and MPFP of the DOI determination and the obligation to submit a NOCO statement within 15 days.

The present circumstances are unusual. The Commission’s determination of DOI usually occurs some amount of time after its determination of eligibility and initial certification for matching funds.²⁵ Thus, at the time the Commission usually certifies post-DOI matching

¹⁹ Mr. Pence may reestablish his eligibility to receive matching funds if he submits evidence of active campaigning in more than one State. 11 C.F.R. §§ 9033.8(a), 9033.6(b).

²⁰ 11 C.F.R. § 9033.5.

²¹ Presidential Election Campaign Fund and Presidential Primary Matching Fund, 44 Fed. Reg. 20336, 20340 (Apr. 4, 1979).

²² 11 C.F.R. § 9034.5(a)(1).

²³ *Id.* § 9034.5(a).

²⁴ 2024 Presidential Candidate Matching Fund Submission Dates and Post Date of Ineligibility Dates to Submit Statements of Net Outstanding Campaign Obligations, 88 Fed. Reg. 31265, 31265 (May 16, 2023) (also establishing submission dates for revised NOCO statements).

²⁵ Indeed, the statute and regulations generally presume that a candidate has already received an initial certification payment before receiving post-DOI matching payments. A candidate who becomes ineligible for matching fund payments “shall be eligible *to continue to receive payments* under section 9037 to defray qualified

payments, the committee's NOCO is well established. Here, not only would the October 28, 2023, DOI pre-date the initial determination of eligibility, but the certification made to the Secretary of Treasury regarding Mr. Pence and MPFP's entitlement to payment of \$100,000 in matching funds would include certified payment to match six contributions totaling \$630 that have been received after the October 28, 2023, DOI.²⁶ Moreover, at the time the Commission would make this certification to Treasury, Mr. Pence and MPFP will not yet have submitted a NOCO statement certifying its post-DOI financial status.

OGC is not aware of any other threshold submission in the history of the public finance program that includes post-DOI contributions. Nonetheless, we conclude that under the present circumstances, post-DOI contributions are "matchable contributions" under 11 C.F.R. § 9034.2.²⁷ All "matchable contributions," regardless of whether they were received before or after the DOI, must meet the same rigorous requirements, including with regard to written instruments, receipt and deposit, contributor identity, and documentation.²⁸ The difference between pre- and post-DOI matchable contributions is how they may be used. The Matching Payment Act states that a candidate who is ineligible to receive any payments because he or she is not actively conducting campaigns in more than one state "shall be eligible to continue to receive payments . . . to defray qualified campaign expenses incurred before the date upon which such candidate becomes ineligible."²⁹

campaign expenses incurred before the date upon which such candidate becomes ineligible." 26 U.S.C. § 9033(c)(2) (emphasis added). Likewise, a candidate who has NOCO on the DOI "may continue to receive matching fund payments for matchable contributions received and deposited on or before December 31 of the Presidential election year" provided the candidate has sufficient NOCO on the date of payment. 11 C.F.R. § 9034.1(b).

²⁶ The Audit Division's Eligibility Report is based on its review of documents from which it concluded MPFP received \$5,000 in matchable contributions in each of 20 states, totaling \$100,000 of matchable contributions. See 11 C.F.R. § 9033.2(b)(3), (c). At this time, Audit staff do not definitively know the date of receipt of MPFP's contributions, only the date those contributions were deposited in MPFP's account.

²⁷ While nothing in the statute or regulations appears to prohibit the inclusion and consideration of post-DOI contributions in the committee's threshold submission for matching fund payment eligibility, we note that the circumstances in this case are highly unusual and unlikely to be repeated. MPFP submitted its certifications and agreements on October 12, 2023, and it submitted revised certifications and agreements correcting certain technical errors on October 31, 2023. The technical errors arose because MPFP apparently used a template from the Commission's website containing those errors. Thus, the Commission ultimately treated October 12, 2023, as the date the certifications and agreements were timely submitted. The resolution of this issue prolonged the threshold submission process. Ultimately the certification was deemed complete upon MPFP's submission of supplemental material on December 28, 2023. See Memorandum from Neven F. Stipanovic, Associate General Counsel, to Patricia C. Orrock, Chief Compliance Officer, Mike Pence and Mike Pence for President – Candidate and Committee Certifications and Agreements (LRA 1194) (May 9, 2024). The Audit Division accepted Mr. Pence's and MPFP's threshold submission as in good order on April 25, 2024. See Eligibility Report of the Audit Division for Mike Pence and Mike Pence for President (May 13, 2024).

²⁸ See 26 U.S.C. § 9034(a); 11 C.F.R. § 9034.2; FEC, Guideline for Presentation in Good Order (July 2007), see also 11 C.F.R. § 9034.3 (defining "non-matchable contributions," including, *inter alia*, in-kind contributions, loans and advances, contributions from other committees, and contributions of currency).

²⁹ 26 U.S.C. § 9033(c)(2) (referencing general rule of ineligibility at 26 U.S.C. § 9033(c)(1), which incorporates the "actively conducting campaigns" language at 26 U.S.C. § 9032(2)); see also 11 C.F.R. § 9033.5

Because the Commission cannot require a NOCO statement prior to determining the DOI, which must occur after certifying initial eligibility and entitlement based on the threshold submission, OGC recommends that the DOI and NOCO obligation notification also notify Mr. Pence and MPFP that the portion of the \$100,000 payment attributable to matched contributions that were received after the DOI may be used for only the limited purpose of defraying NOCO, plus estimated necessary winding down costs.³⁰ Accordingly, OGC recommends the Commission approve the sending of the proposed notification to Mr. Pence and MPFP attached to this memorandum.

III. RECOMMENDATIONS

OGC recommends that, if the Commission determines that Mr. Pence and MPFP are eligible to receive matching funds and certifies to the Secretary of Treasury the initial \$100,000 matching payment, the Commission:

1. Determine that Mike Pence and Mike Pence for President's date of ineligibility, under 26 U.S.C. § 9033(c) and 11 C.F.R. § 9033.5(a)(1), is October 28, 2023; and
2. Approve the appropriate letter notifying Mr. Pence and MPFP of the DOI determination, instructing Mr. Pence and MPFP to submit a statement of net outstanding campaign obligations within 15 calendar days, and notifying Mr. Pence and MPFP that the portion of the \$100,000 payment attributable to matched contributions that were received after the DOI may be used for only the limited purpose of defraying NOCO, plus estimated necessary winding down costs.

Attachment: Proposed Notification to Mike Pence and Mike Pence for President

(after DOI is determined, matching payments are made only to the extent the candidate has NOCO); *id.* § 9034.5 (determining NOCO).

³⁰ Should Audit Division staff discover, and the Commission make a finding, in the audit of MPFP that MPFP spent some or all of the portion of the \$100,000 payment attributable to post-DOI matchable contributions in excess of NOCO, the Commission may seek a repayment. *See* 26 U.S.C. § 9038(b); 11 C.F.R. § 9038.2.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

May ____, 2024

VIA E-MAIL AND REGULAR MAIL

The Honorable Mike Pence
Mike Pence for President
c/o Matthew Morgan, Esq.
Barnes & Thornburg
11 S Meridian Street
Indianapolis, IN 46204
MMorgan@btlaw.com

Re: Notification of Date of Ineligibility for Public Funds

Dear Mr. Pence:

On May ____, 2024, the Commission made a determination that you are eligible to receive payments from the Presidential Primary Matching Payment Account under the provisions of 26 U.S.C. § 9037 and 11 C.F.R. § 9037.1, and issued a letter notifying you of this determination. I am writing to notify you that, following this determination of your eligibility, the Commission also determined that your date of ineligibility (“DOI”) for the purpose of using public funds to seek nomination of the Republican Party for election to the office of President is October 28, 2023. The Commission concluded that on this date you publicly announced that you will not be actively conducting campaigns in more than one state.¹ See 11 C.F.R. § 9033.5(a)(1).

Within 15 days of this notification, you must submit to the Commission a statement of net outstanding campaign obligations (“NOCO statement”). See 11 C.F.R. § 9034.5(a). Your NOCO statement is therefore due on May ____, 2024. A NOCO statement must be submitted for the Commission to determine if you are entitled to receive matching payments for the purpose of winding down your campaign. 11 C.F.R. § 9033.5(a).

With each additional submission for matching funds that you make, you must certify that your net outstanding campaign obligations equal or exceed the amount submitted for matching. 11 C.F.R. § 9034.5(f)(1). You will be required to submit revised NOCO statements before the

¹ On October 28, 2023, you stated, “I have decided to suspend my campaign for president effective today ... this is not my time,” and said, “I’m leaving this campaign,” and “as we leave this campaign we do so with grateful hearts.”

next regularly scheduled payment date. 11 C.F.R. § 9034.5(f)(2). Please refer to the enclosed list for future submission dates.

Additionally, because the Commission certified to the Department of Treasury an initial \$100,000 matching payment, part of which is attributable to contributions apparently received after your DOI, I am writing to notify you that the portion of the initial \$100,000 payment attributable to matched contributions that were received after the DOI may be used for only the limited purpose of defraying net outstanding campaign obligations, plus estimated necessary winding down costs. Based on available information provided in your threshold submission, the Audit Division has identified six such contributions totaling \$630.

You may reestablish your eligibility to receive matching funds if you submit evidence of active campaigning in more than one State. 11 C.F.R. §§ 9033.8(a), 9033.6(b).

The Audit Division will notify you of the date when the Commission intends to commence fieldwork on the audit and examination required by 26 U.S.C. § 9038(a). The Commission may use the information obtained during the audit as the basis, or partial basis, for any entitlement or repayment determination it may make under 26 U.S.C. §§ 9036 and 9038(b) and 11 C.F.R. §§ 9036.2 and 9038.2.

If you have any questions concerning this matter you may contact Jessica Selinkoff, Assistant General Counsel, Policy Division – Compliance Advice, at (202) 694-1527, or Zuzana Pacious, Acting Assistant Staff Director, Audit Division, at (202) 694-1200 or (800) 424-9530.

Sincerely,

Sean J. Cooksey
Chairman

Enclosure

SCHEDULE OF MATCHING FUND SUBMISSION DATES AND DATES TO SUBMIT REVISED STATEMENTS OF NET OUTSTANDING CAMPAIGN OBLIGATIONS (NOCO) FOR 2024 PRESIDENTIAL CANDIDATES

Matching fund submission dates	Revised NOCO submission dates
January 2, 2024	December 21, 2023.
February 1, 2024	January 24, 2024.
March 1, 2024	February 22, 2024.
April 1, 2024	March 22, 2024.
May 1, 2024	April 23, 2024.
June 3, 2024	May 23, 2024.
July 1, 2024	June 21, 2024.
Aug. 1, 2024	July 24, 2024.
September 3, 2024	August 23, 2024.
October 1, 2024	September 23, 2024.
November 1, 2024	October 24, 2024.
December 2, 2024	November 21, 2024.
January 2, 2025	December 23, 2024.
February 3, 2025	January 24, 2025.
March 3, 2025	February 21, 2025.