



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2634

DATE SCANNED

3/10/15

SCANNER NO.

2

SCAN OPERATOR

EE5



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2013 FEB -4 PM 1:44

February 4, 2013

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO/PO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *JW* Jodi Winship/Sari Pickerall *JP*  
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2012 30 Day Post-General  
Report (Authorized Committees) For The Administrative Fine  
Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2012 30 Day Post-General Report in accordance with 2 U.S.C. 434(a). The list is comprised of authorized committees whose candidates sought election in the November 6<sup>th</sup> General Election.

The committees listed in the attached RTB Circulation Report either failed to file the report, or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

**Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary

—**THE CHINESE**—

- THE CHINESE**—

Federal Election Commission  
Reason to Believe Circulation Report  
2012 POST-GENERAL Not Election Sensitive 12/06/2012 AUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2630	C00521989	ALEX PIRES FOR U S SENATE	PIRES, ALEXANDER J JR	STEPHEN W. SPENCE	\$822,949	0	1/9/2013	Not Filed	\$98,161	\$3,850
2631	C00506592	COMMITTEE TO ELECT WENDY ROSEN FOR CONGRESS	ROSEN, WENDY W	STEVEN D. ROSEN	\$310,377	0	1/28/2013	Not Filed	\$7,000	\$330
2632	C00473710	FRIENDS OF LIBERTY FOR JESSICA	PUENTE BRADSHAW, JESSICA	GARY E. DOAN	\$145,914	0		Not Filed	\$14,591 (est)	\$550
2633	C00498311	IMUS FOR CONGRESS	IMUS, GREGG	CHAD HANEY	\$228,972	0		Not Filed	\$28,622 (est)	\$990
2634	C00512228	SCOLLO FOR CONGRESS	SCOLLO, PHILIP	LISA KLEIN	\$373,238	0	2/4/2013	Not Filed	\$67,730	\$2,970
2635	C00509588	SHELDON FOR CONGRESS	SHELDON, CHRISTOPHER	PATRICIA TOYE	\$142,980	0	12/15/2012	9	\$33,858	\$380

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation - 2012 )  
30 Day Post-General Report (Authorized )  
Committees) for the Administrative Fine )  
Program: )  
ALEX PIRES FOR U S SENATE, and ) AF# 2630  
STEPHEN W SPENCE as treasurer; )  
COMMITTEE TO ELECT WENDY ) AF# 2631  
ROSEN FOR CONGRESS, and STEVEN )  
D ROSEN as treasurer; )  
FRIENDS OF LIBERTY FOR JESSICA, ) AF# 2632  
and DOAN, GARY E MR. as treasurer; )  
IMUS FOR CONGRESS, and CHAD ) AF# 2633  
HANELY as treasurer; )  
SCOLLO FOR CONGRESS, and LISA ) AF# 2634  
KLEIN as treasurer; )  
SHELDON FOR CONGRESS, and ) AF# 2635  
PATRICIA TOYE as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on February 05, 2013 the Commission took the following actions on the Reason To Believe Recommendation - 2012 30 Day Post-General Report (Authorized Committees) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated February 04, 2013, on the following committees:

AF#2630 Decided by a vote of 5-0 to: (1) find reason to believe that ALEX PIRES FOR U S SENATE, and STEPHEN W SPENCE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2631 Decided by a vote of 5-0 to: (1) find reason to believe that COMMITTEE TO ELECT WENDY ROSEN FOR CONGRESS, and STEVEN D ROSEN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2632 Decided by a vote of 5-0 to: (1) find reason to believe that FRIENDS OF LIBERTY FOR JESSICA, and DOAN, GARY E MR. as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2633 Decided by a vote of 5-0 to: (1) find reason to believe that IMUS FOR CONGRESS, and CHAD HANELY as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2634 Decided by a vote of 5-0 to: (1) find reason to believe that SCOLLO FOR CONGRESS, and LISA KLEIN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2635 Decided by a vote of 5-0 to: (1) find reason to believe that SHELDON FOR CONGRESS, and PATRICIA TOYE as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

February 6, 2013  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 6, 2013

Lisa Klein, in official capacity as Treasurer  
Scollo for Congress  
161 Crocus Lane  
Milford, PA 18337

C00512228  
AF#: 2634

Dear Ms. Klein:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled general election for which the candidate sought election. This report, covering the period through November 26, 2012, shall be filed no later than December 6, 2012. 2 U.S.C. 434(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. 434(a). 2 U.S.C. 437g(a)(4). On February 5, 2013, the FEC found that there is reason to believe ("RTB") that Scollo for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. 434(a) by failing to file timely this report on or before December 6, 2012. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$2,970. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$2,970 is due within forty (40) days of the finding, or by March 17, 2013; and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$67,730

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purpose of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or March 17, 2013. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Scollo for Congress and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate



action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Ellen L. Weintraub  
Chair

---

**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$2,970 for the 2012 Post-General Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by March 17, 2013. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

---

FOR: Scollo for Congress

FEC ID#: C00512228

AF#: 2634

PAYMENT DUE DATE: March 17, 2013

PAYMENT AMOUNT DUE: \$2,970

# FEC OFFICE OF ADMIN REVIEW

2013 MAR 18 PM 12: 26

Office of Administrative Review  
Federal Election Commission  
999 E Street NW  
Washington, DC 20463

Re: C00512228  
AF#:2634

Scollo for Congress

To whom it may concern:

This is in response to your letter of February 6, 2013 and to respectfully challenge the "Reason to Believe" that our campaign violated FEC reporting requirements.

We had chosen to file our campaign reports electronically and comported with all required deadlines. We reported electronically through "NGP" software.

Very shortly after Election Day, we closed our NGP account. We prepared the "30 Day Post-General Report of Receipts and Disbursements" in paper format and in a timely fashion, but learned the commission would not accept a paper version. We were in constant communication with the FEC. But were stuck on how to report electronically because our NGP account was closed.

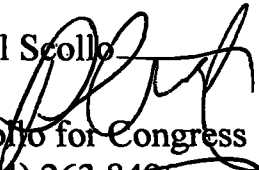
Ultimately, we decided to reopen our NGP account and were able to submit the required report electronically.

This was our first time running for office. After the campaign, our team dispersed making communication difficult.

We hope you will remove this violation as it resulted from a technical and communication breakdown that, in no way, diverted our good faith efforts to comport with FEC reporting requirements.

Thank you for your understanding and kind consideration,

Sincerely,

Phil Scollo  
  
Scollo for Congress  
(914) 263-8495

2011-01-09 10:00 AM



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Via First Class Mail

March 18, 2013

Lisa Klein, in official capacity as Treasurer  
Scollo for Congress  
161 Crocus Lane  
Milford, PA 18337

C00512228

AF#: 2634

Dear Ms. Klein:

On March 18, 2013, the Commission received the written response ("challenge") which is being reviewed by the Office of Administrative Review. If you have any questions regarding the challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

*Rhiannon Magruder*

Rhiannon Magruder  
Acting Reviewing Officer  
Office of Administrative Review

**Date:** March 20, 2013

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW  
CHALLENGE RECEIVED**

**AF#: 2634**

**Committee Name:** Scollo for Congress

**Committee ID#:** C00512228

**Committee Address (if different than in RTB letter):** N/A

**Treasurer Name (if different than in RTB finding):** N/A

**Attachments:**

- **Copy of RTB Circulation Report, dated February 4, 2013 and RTB Certification, dated February 6, 2013 (Y/N):** Previously Forwarded
- **Proof of Delivery (to be forwarded at later date if not yet received) (Y/N):** Y
- **Other Relevant Telecoms (Y/N):** N
- **Original Correspondence Received by RAD in Response to RTB Letter (Y/N):** N
- **RAD Staff Declaration (Y/N):** Y
  - 2012 30 Day Post-General Report Notice, dated October 1, 2012.
  - Non-Filer Letter, dated December 18, 2012.
  - RTB Letter, dated February 6, 2013.
- **Other RAD Information: (Y/N):** N



## Delivery Notification

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

**Tracking Number:** 1Z WF5 860 A2 9617 792 6  
**Reference Number(s):** RAD, 2634  
**Service:** NEXT DAY AIR  
**Special Instructions:** ADULT SIGNATURE REQUIRED  
**Shipped/Billed On:** 02/05/2013  
**Delivered On:** 02/07/2013 6:31 P.M.  
**Delivered To:** 161 CROCUS LN  
MILFORD, PA, US 18337  
**Signed By:** SBOLLO  
**Location:** RESIDENTIAL

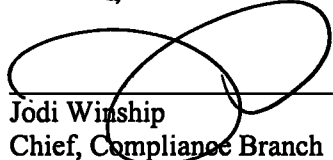
Thank you for giving us this opportunity to serve you.

Sincerely,  
UPS

Tracking results provided by UPS: 02/08/2013 9:31 A.M. ET

## DECLARATION OF JODI WINSHIP

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Scollo for Congress:
  - A) Report Notice, dated October 1, 2012, referencing the 2012 30 Day Post-General Report (sent via electronic mail to: scolloforcongress@gmail.com);
  - B) Non-Filer Letter, dated December 18, 2012, referencing the 2012 30 Day Post-General Report;
  - C) Reason-to-Believe Letter, dated February 6, 2013 referencing the 2012 30 Day Post-General Report.
3. I hereby certify that I have searched the Commission's public records and find that Scollo for Congress filed the 2012 30 Day Post-General Report with the Commission on February 4, 2013.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 18<sup>th</sup> day of March, 2013.



Jodi Winship  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission





# GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL COMMITTEES

October 1, 2012

## CURRENT REPORT DUE FOR 2012 GENERAL ELECTION CANDIDATE COMMITTEES

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
Pre-General	10/01/12 - 10/17/12	10/22/12	10/25/12
48-Hour Notices	10/18/12 - 11/03/12	-- general candidates only -- see filing info --	
Post-General	10/18/12 - 11/26/12	12/06/12	12/06/12

## REPORTING SCHEDULE FOR REMAINDER OF 2012

### 2012 GENERAL ELECTION CANDIDATES

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
Year-End	11/27/12 - 12/31/12	01/31/13	01/31/13

### UNSUCCESSFUL 2012 PRIMARY ELECTION CAMPAIGN COMMITTEES AND CANDIDATES NOT ACTIVE IN 2012 ELECTIONS

REPORT	REPORTING PERIOD <sup>1</sup>	REG./CERT. & OVERNIGHT MAILING DEADLINE	FILING DEADLINE
Year-End	10/01/12 - 12/31/12	01/31/13	01/31/13

[Click here for Supplemental Filing Information](#)

<sup>1</sup>A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

## 2012 SUPPLEMENTAL FILING INFORMATION CONGRESSIONAL COMMITTEES

**PLEASE NOTE:** The Commission provides reminders of upcoming filing dates as a courtesy to help committees comply with the filing deadlines set forth in the Act and Commission regulations. Committee treasurers must comply with all applicable filing deadlines established by law, and the lack of prior notice does not constitute an excuse for failing to comply with any filing deadline.

### WHO MUST FILE

Principal campaign committees of congressional candidates <sup>1</sup> (including unopposed candidates and candidates whose names do not appear on the ballot) must file Quarterly Reports in 2012. <sup>2</sup>

Campaigns that raise or spend more than \$5,000 for the 2012 election cycle (and thus trigger registration and reporting requirements) must file quarterly reports throughout 2012, even if the candidate plans to retire, withdraws from the race prior to the primary election, loses the primary or drops out of the race prior to the general election. See 11 CFR 104.5(a)(2).

Before a committee can stop filing with the FEC, it must file a termination report with the Commission. See 11 CFR 102.3. Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

### METHODS OF FILING REPORTS

#### Electronic Filing

Reports filed electronically must be received and validated by the Commission by 11:59 p.m. Eastern Time on the filing deadline. See 11 CFR 104.5(e). See also 11 CFR 104.18 and 100.19.

- Web Page: Electronic Filing Page
- Campaign Guide for Congressional Candidates and Committees (Candidate Guide), pp. 83-86 [PDF]

#### Paper Filing - Meeting the Filing Deadline

Paper Report filing options -- Registered, Certified or Overnight or First Class Mail. See 11 CFR 104.5(e). See also 11 CFR 100.19.

- Web Page: Link to Paper Forms (for downloading and printing)
- Candidate Guide, p. 82 [PDF]

---

<sup>1</sup> Generally, an individual becomes a candidate for federal office (and thus triggers registration and reporting obligations) when his or her campaign exceeds \$5,000 in either contributions or expenditures. If the campaign has not crossed the \$5,000 threshold, it is not required to file reports. See 11 CFR 100.3(a). See also 11 CFR 104.5(a).

<sup>2</sup> If a candidate has more than one authorized committee, the principal campaign committee files a consolidated report on Form 3Z [PDF]. See 11 CFR 104.3(f).

## PRE- AND POST-ELECTION REPORTS

The principal campaign committee of any candidate participating in a 2012 state primary, nominating convention or runoff election -- even if unopposed -- must also file a pre-election report 12 days prior to the primary, nominating convention or runoff. The principal campaign committee of a candidate who participates in the general election must file pre- and post-general election reports. See 11 CFR 104.5(a)(2).

- Web Page: 2012 Congressional Pre-Primary Reporting Dates
- The Record:
  - FEC Record Blog: Reporting
  - January 2012 issue [PDF]
- Candidate Guide, pp. 81-82 [PDF]

## 48 HOUR NOTICES OF CONTRIBUTIONS

The principal campaign committee must file notices if any authorized committees receive any contribution (including in-kind gifts or advances of goods or services; loans from the candidate or other non-bank sources; and guarantees or endorsements of bank loans to the candidate or committee) of \$1,000 or more per source, during the period less than 20 days but more than 48 hours before any election in which the candidate is running. See 11 CFR 104.5(f).

The notices must reach the appropriate federal filing office within 48 hours of the committee's receipt of the contribution(s). **Campaign committees that file electronically MUST submit their 48-hour notices electronically.** See 11 CFR 104.5(f).

- Web Page: Electronic Filing Page
- Web Page: Link to Paper Forms (for downloading and printing)
- Web Page: Link to Web Form 6 (for online submission)
- Form 6 Fax numbers
  - Senate campaigns (Secretary of the Senate): (202) 224-1851
  - House Campaigns (FEC): (202) 219-0174
- Campaign Guide: Candidate Guide, p. 81 [PDF]

## 2012 REPORTING SCHEDULE

- Web Page: 2012 Reporting Dates Page
- The Record:
  - FEC Record Blog: Reporting
  - January 2012 issue [PDF]
- Candidate Guide, p. 83 [PDF]

## COMPLIANCE

### Treasurer Responsibility

Committee Treasurers are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.

See 11 CFR 104.14(d).

- Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings [PDF]
- Candidate Guide, p. 7-9 [PDF]

### Administrative Fine Program

Political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$17,600 (or more for repeat late- and non-filers).<sup>3</sup> See generally, 11 CFR Part 111 Subpart B. See also 11 CFR 111.43.

- Web Page: Administrative Fine Program
- Candidate Guide, pp. 82-83 [PDF]

## DISCLOSURE OF LOBBYIST BUNDLING ACTIVITY

Campaign committees must file FEC Form 3L [PDF] if they receive two or more bundled contributions from lobbyists/registrants or lobbyist/registrant PACs that aggregate in excess of \$16,700 during the applicable reporting period (see page 1 of this notice). See 11 CFR 104.22 and 11 CFR 110.17(f).

- The Record: March 2009 issue [PDF]
- Candidate Guide, Appendix F, pp. 155-161 [PDF]

## IMPORTANT FILING INFORMATION - PAPER FILERS

In response to the 2001 anthrax threat, the U.S. Postal Service is irradiating mail directed to many federal agencies, including the FEC and the Secretary of the Senate.<sup>4</sup> This process has not only delayed mail delivery, it has also damaged and in some cases destroyed pieces of mail. As a result, committees that file reports with the FEC may want to consider submitting their reports by some means other than U.S. mail. Alternative methods include electronic filing, overnight mail or delivery service, and hand delivery.

<sup>3</sup> Penalties for late- or non-filing of 48-hour notices are based on the amount of contributions not timely disclosed. As a result, these penalties may exceed \$17,600, even for first-time violations.

<sup>4</sup> Senate committees should contact the Secretary of the Senate at (202) 224-0322 for more information on filing reports via US mail.

---

**FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 18, 2012

RQ-7

LISA KLEIN, TREASURER  
SCOLLO FOR CONGRESS  
PO BOX 8  
MILFORD, PA 18337-7123

IDENTIFICATION NUMBER: C00512228

REFERENCE: POST-GENERAL REPORT 10/18/2012 - 11/26/2012

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended.

It is important that you file this report immediately. The report must be filed with the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463 for House candidates, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 (if sent via overnight delivery service) or Senate Office of Public Records, P.O. Box 77578, Washington, DC 20013-7578 (if sent via USPS) for Senate Candidates. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at [www.fec.gov](http://www.fec.gov).

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Marlene Colucci in the Reports Analysis Division on our toll free number (800)424-9530. Our local number is (202)694-1130.

Sincerely,

*Debbie Chacona*

Debbie Chacona  
Assistant Staff Director  
Reports Analysis Division (RAD)

12030984828



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2013 APR -8 PM 1:33

**SENSITIVE**

April 8, 2013

**MEMORANDUM**

To: The Commission

Through: *for* Alec Palmer *AP*  
Staff Director

From: Patricia C. Orrock *PO*  
Chief Compliance Officer

Rhiannon Magruder *RM*  
Acting Reviewing Officer  
Office of Administrative Review

Subject: Reviewing Officer Recommendation in AF# 2634 – Scollo for Congress and Lisa Klein, in her official capacity as Treasurer (C00512228)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 8, 2013

**REVIEWING OFFICER RECOMMENDATION  
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 2634 – Scollo for Congress and Lisa Klein, in her official capacity as Treasurer (C005 2228)

**Summary of Recommendation**

Make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a \$2,970 civil money penalty.

**Reason-to-Believe Background**

On February 5, 2013, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to timely file the 2012 30 Day Post-General Report and made a preliminary determination that the civil money penalty was \$2,970 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on February 6, 2013 to notify them of the Commission's RTB finding and civil money penalty.

**Legal Requirements**

The Federal Election Campaign Act ("Act") requires that post-general reports must be filed by the treasurer of a principal campaign committee no later than the 30th day after any general election in which the candidate has sought election and shall be complete as of the 20th day after the general election. 2 U.S.C. § 434(a)(2)(A)(ii) and 11 C.F.R. § 104.5(a)(2)(ii). Political committees required to file reports with the Commission must file in an electronic format if they have received contributions or made expenditures or expect to receive contributions or make expenditures in a calendar year aggregating in excess of \$50,000. 2 U.S.C. § 434(a)(11) and 11 C.F.R. § 104.18(a). Reports electronically filed must be received and validated at or before 11:59 p.m. Eastern Standard/Daylight Time on the filing date to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

**Respondents' Challenge**

On March 18, 2013, the Commission received the written response ("challenge") from the Candidate challenging the RTB finding. The Candidate requests the Commission "remove this violation as it resulted from a technical and communication breakdown that, in no way, diverted [their] good-faith efforts to comport with FEC reporting requirements." The Candidate also states this was his first time running for office, and the team dispersed after the election.

The challenge states that the Committee had previously electronically filed its reports using NGP software, but the Committee's NGP account was closed after the election. The Committee timely prepared the 2012 30 Day Post-General Report in paper format, and then learned the report was required to be electronically filed. The Committee was in constant communication with the

Commission, but they were unsure how to electronically file the report without NGP. Once the Committee reopened their NGP account, the report was submitted electronically.

### Analysis

The Commission notified the respondents on two occasions that it had failed to file the 2012 30 Day Post-General Report. On December 7, 2012, the Electronic Filing Office (EFO) sent a notice to "will@scollocongress.com," the email address previously provided by the Committee. On December 18, 2012, the Reports Analysis Division (RAD) sent a non-filer notice to their address of record.

According to RAD telecoms (written records of telephone conversations), Philip Scollo, Candidate, called the Compliance Analyst and Reports Analyst on multiple occasions in January 2013. The Candidate first called the Compliance Analyst on January 10, 2013, after receiving the Commission's non-filer notice. The Candidate explained the report was never submitted due to a miscommunication with the campaign manager. After indicating he may need help filing the report with NGP software, the Analyst advised the Candidate to contact NGP and also provided him with the contact information for the Committee's Reports Analyst.

During subsequent conversations with the Compliance Analyst and Reports Analyst, the Candidate explained the Committee was attempting to file the report but no longer had access to its NGP account. Each analyst confirmed the report must be electronically filed and recommended he contact EFO for assistance. Although he was once transferred to EFO and also provided with EFO contact information, EFO has no record of communication with the Committee regarding the filing of the 2012 30 Day Post-General Report.

On January 28, 2013, the Candidate again called the Reports Analyst and asked if he could submit a PDF version of the report. After the Analyst reiterated that the report must be filed electronically, the Candidate stated he would contact NGP to file the report. The 2012 30 Day Post-General Report was electronically filed using NGP software on February 4, 2013.

The Reviewing Officer recognizes that this was the Candidate's first campaign, and there was a communication and technical breakdown as a result of the staff dispersing after the election. However, inexperience or unavailability of the treasurer or other staff and delays caused by committee vendors are included at 11 C.F.R. § 111.35(d) as examples of circumstances that will not be considered reasonably unforeseen and beyond the respondents' control. Their challenge fails to address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a \$2,970 civil money penalty.



### **OAR Recommendations**

- 1) Adopt the Reviewing Officer recommendation for AF# 2634 involving Scollo for Congress and Lisa Klein, in her official capacity as Treasurer, in making the final determination;
- 2) Make a final determination in AF# 2634 that Scollo for Congress and Lisa Klein, in her official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a \$2,970 civil money penalty; and
- 3) Send the appropriate letter.

Acting Reviewing Officer: Rhiannon Magruder

### **Attachments**

- Attachment 1 –
- Attachment 2 –
- Attachment 3 –
- Attachment 4 – Declaration from OAR

### DECLARATION OF RHIANNON MAGRUDER

1. I am the Acting Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Acting Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 2012 30 Day Post-General Report is due December 6, 2012. Reports sent by first class mail are considered filed on the date of receipt. If electronically filed, it must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on December 6, 2012 to be timely filed.
3. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FEC file software or administrative fine regulations, including due dates of reports and filing requirements.
4. I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
  - a. Page 1 of the Summary Page for the 2012 30 Day Post-General Report electronically filed by Scollo for Congress and Lisa Klein, in her official capacity as treasurer. According to the Commission's records, the report was received on February 4, 2013 and covers the period from October 18 through November 26, 2012.
5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 8th of April, 2013.

Rhiannon Magruder

Rhiannon Magruder  
Acting Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

# SUMMARY PAGE

of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 2 / 39

Write or Type Committee Name

Scollo for Congress

Report Covering the Period: From: 10 18 2012 To: 11 26 2012

	COLUMN A This Period	COLUMN E: Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e)) ....	30616.00	190567.00
(b) Total Contribution Refunds (from Line 20(d)) .....	0.00	0.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)) .....	30616.00	190567.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17) .....	37113.80	174175.06
(b) Total Offsets to Operating Expenditures (from Line 14) .....	0.00	0.00
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)) .....	37113.80	174175.06
8. Cash on Hand at Close of Reporting Period (from Line 27) .....	8535.33	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	

For further information contact:

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**VIA OVERNIGHT DELIVERY**

April 8, 2013

Lisa Klein, in official capacity as Treasurer  
Scollo for Congress  
161 Crocus Lane  
Milford, PA 18337

C00512228

AF#: 2634

Dear Ms. Klein:

On February 5, 2013, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Scollo for Congress and you, in your official capacity as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2012 30 Day Post-General Report. The Commission also made a preliminary determination that the civil money penalty was \$2,970 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Rhiannon Magruder".

Rhiannon Magruder  
Acting Reviewing Officer  
Office of Administrative Review

Phil Scollo  
161 Crocus Lane  
Milford, PA 18337  
(914) 263-8495

April 16, 2013

Federal Election Commission  
999 E. Street NW  
Washington, DC 20463  
Attn: Commission Secretary

Via fax: 202-208-3338

Re: AF#2634  
Scollo for Congress  
C0051222

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT  
2013 APR 16 P 1:41

Dear Commission Secretary:

We have received a letter dated April 8, 2013, from Rhiannon Magruder, Acting Reviewing Officer, attaching her recommendation.

We ask that the commission give special consideration to our challenge as the penalty recommended is Draconian relative to a minor technical inadherence to procedural requirements.

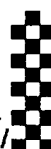
When we became aware of the penalty, we worked daily to reactivate the software that would allow us to file our report electronically again.

Thank you for your kind consideration.

Sincerely



Phil Scollo





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2013 APR 17 PM 3:19

April 17, 2013

MEMORANDUM

**SENSITIVE**

To: The Commission

Through: Alec Palmer *AP*  
Staff Director

From: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Rhiannon Magruder *RM*  
Acting Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2634 – Scollo for Congress and Lisa Klein, in her official capacity as Treasurer (C00512228)

On February 5, 2013, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2012 30 Day Post-General Report and made a preliminary determination that the civil money penalty was \$2,970 based on the schedule of penalties at 11 C.F.R. § 111.43.

On March 18, 2013, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated April 8, 2013 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that they violated 2 U.S.C. § 434(a) and assess a \$2,970 civil money penalty because they submitted no evidence that a factual error was made in the RTB finding, that the penalty was miscalculated at RTB or that they used best efforts to file on time. 11 C.F.R. § 111.35(b).

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On April 16, 2013, the Commission received their written response. The Candidate requests "that the [C]ommission give special consideration to [their] challenge as the penalty recommended is Draconian relative to a minor technical inadherence to procedural requirements." In addition, the response notes that the Committee worked daily to reactivate their software account to allow them to electronically file.

The 2012 30 Day Post-General Report was electronically filed on February 4, 2013 and is considered not filed pursuant to 11 C.F.R. § 111.43(e)(1). The report discloses \$30,616 in total receipts and \$37,114 in total disbursements, resulting in a level of activity of \$67,730. Therefore, using the schedule of penalties at 11 C.F.R. § 111.43(a) for not filed reports, respondents with no previous violations, and the level of activity bracket of \$50,000 - \$74,999.99, the civil money penalty is  $\$2,970 \times [1 + (.25 \times 0)]$  or \$2,970.

As addressed in the ROR, delays caused by committee vendors is included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a \$2,970 civil money penalty.

#### **OAR Recommendations**

- 1) Adopt the Reviewing Officer recommendation for AF# 2634 involving Scollo for Congress and Lisa Klein, in her official capacity as Treasurer, in making the final determination;
- 2) Make a final determination in AF# 2634 that Scollo for Congress and Lisa Klein, in her official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a \$2,970 civil money penalty; and
- 3) Send the appropriate letter.

Acting Reviewing Officer: Rhiannon Magruder

**Attachment:** Response to ROR

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Final Determination Recommendation: ) AF 2634  
Scollo for Congress and Lisa Klein, in )  
her official capacity as Treasurer )  
(C00512228) )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on May 02, 2013, the Commission decided by a vote of 5-0 to take the following actions in AF# 2634:

1. Adopt the Reviewing Officer recommendation for AF# 2634 involving Scollo for Congress and Lisa Klein, in her official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 2634 that Scollo for Congress and Lisa Klein, in her official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a \$2,970 civil money penalty.
3. Send the appropriate letter.

Commissioners Hunter, McGahn II, Petersen, Walther and Weintraub voted affirmatively for the decision.

Attest:

May 2, 2013  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 10, 2013

**VIA OVERNIGHT DELIVERY**

Lisa Klein, in official capacity as Treasurer  
Scollo for Congress  
161 Crocus Lane  
Milford, PA 18337

C00512228  
AF#: 2634

Dear Ms. Klein:

On February 5, 2013, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Scollo for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) for failing to file the 2012 30 Day Post-General Report. By letter dated February 6, 2013, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$2,970 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On March 18, 2013, the Office of Administrative Review received your written response, challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and the written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Scollo for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty in the amount of \$2,970 in accordance with 11 C.F.R. § 111.43. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on April 8, 2013.

On April 16, 2013, the Commission received your written response. On May 2, 2013, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Scollo for Congress and you, in your official capacity as Treasurer, violated 2 U.S.C. § 434(a) and assessed a civil money penalty of \$2,970. It is based on the same factors used to calculate the civil money penalty at RTB. A copy of the final determination recommendation is attached.

At this juncture, the following courses of action are available to you:

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

**2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, send the enclosed remittance form, along with your payment, to the address on page 4 within 30 days of receipt of this letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

**5. Settlement Offers**

If you make a payment in an amount less than the civil money penalty as an offer to settle or compromise a debt owed to the Commission, the offer is herewith rejected despite any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 CFR § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Ellen L. Weintraub  
Chair

-----  
**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$2,970 for the 2012 30 Day Post-General Report.

This penalty should be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
PO Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC # 979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

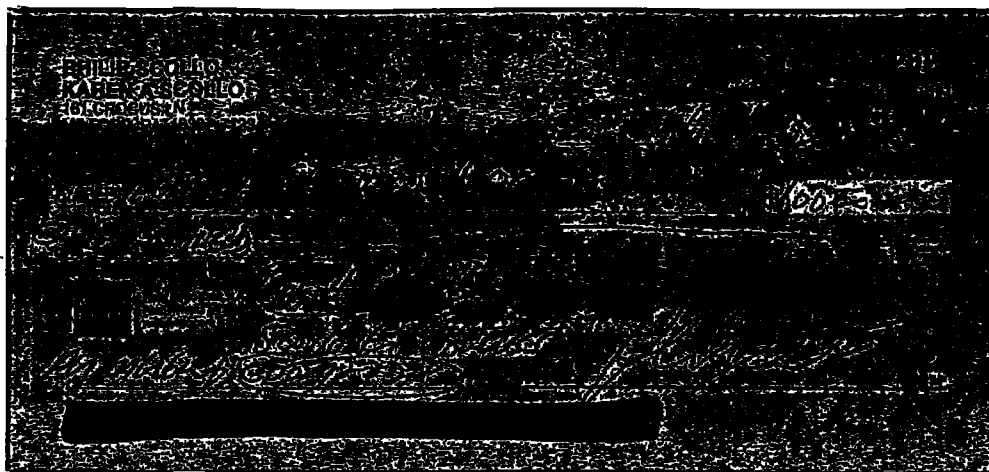
**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
-----

FOR: Scollo for Congress

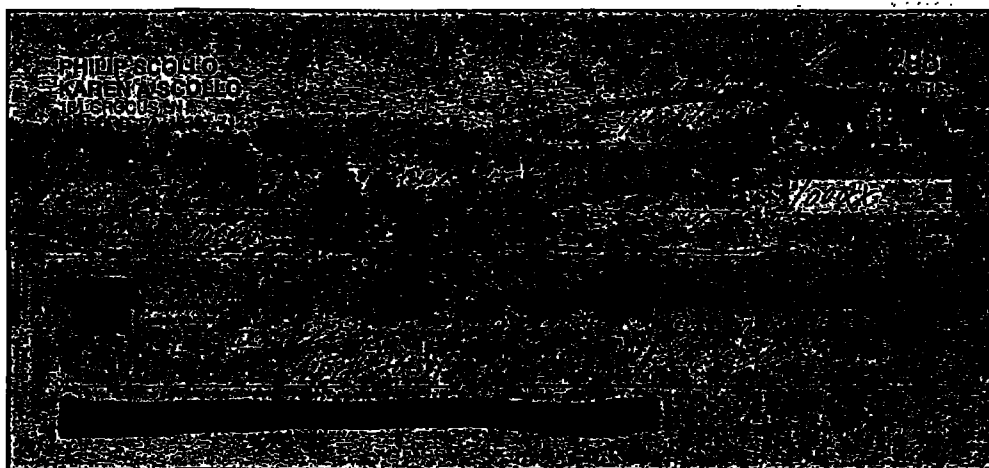
FEC ID#: C00512228

AF#: 2634

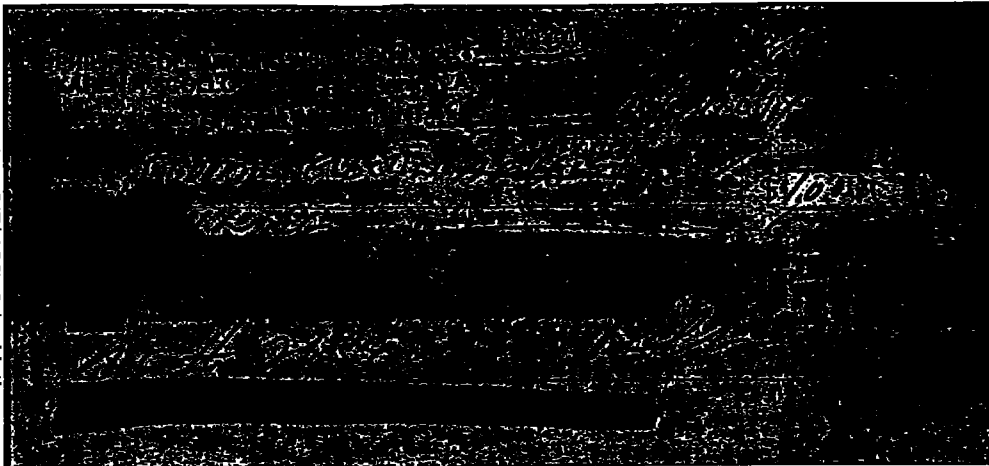
PAYMENT AMOUNT DUE: \$2,970

**usbank.**St. Louis GA Lockbox  
(314) 425-1818

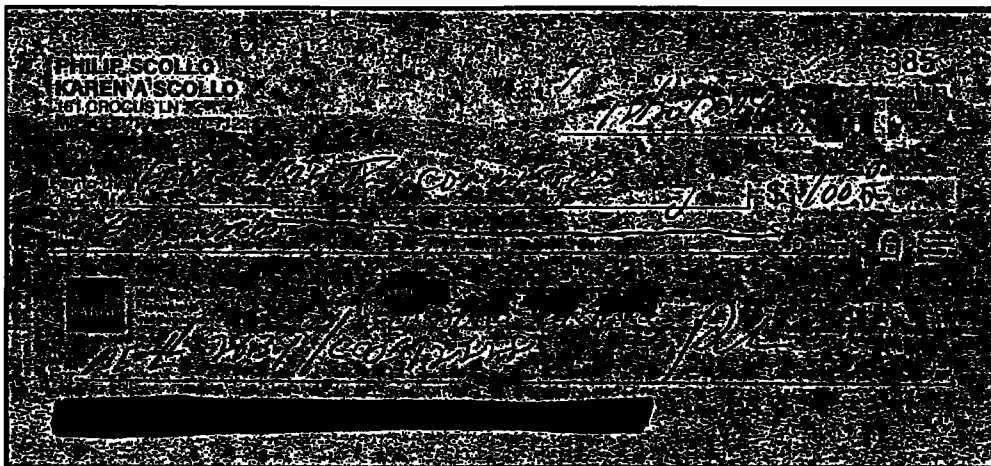
Batch	Item	TID	Batch Total	Amount
1	1	Y-3023185	\$100.00	\$100.00

**usbank.**St. Louis GA Lockbox  
(314) 425-1818

Batch	Item	TID	Batch Total	Amount
1	1	Y-3041920	\$100.00	\$100.00

**usbank.**St. Louis GA Lockbox  
(314) 425-1818

Batch	Item	TID	Batch Total	Amount
1	1	Y-3098277	\$100.00	\$100.00

**usbank.**St. Louis GA Lockbox  
(314) 425-1818

Batch	Item	TID	Batch Total	Amount
1	1	Y-3078922	\$345.00	\$100.00



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2634

DATE SCANNED 3/10/15

SCANNER NO. 2

SCAN OPERATOR SES

1-800-424-9547