



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2900

DATE SCANNED 8/17/15

SCANNER NO. 2

SCAN OPERATOR OH



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIA

2015 JAN 30 PM 3: 16

January 30, 2015

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser/Sari Pickerall *KDR* *SP*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2014 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 2014 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)). The list is comprised of authorized committees whose candidates sought election in the November 4<sup>th</sup> General Election.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report : after the due date, 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.

An explanation of the civil money penalties calculation for the committees that failed to file the report is outlined below:

HOUSE DOCUMENT

The committee (AF 2896) represents a candidate that participated in the 2014 General Election. The committee was required to file a 2014 30 Day Post-General Report (30G) covering October 16, 2014 through November 24, 2014 (40 days). In order to determine the civil money penalty for the 2014 30 Day Post-General Report, an estimated level of activity was calculated using a per diem average by multiplying the previous activity reported for the 2013-2014 election cycle (\$154,934) by 9.07% (the number of days required in 30G (40) divided by the number of days included in the Committee's 2013-2014 election cycle reports (441)).

The committee (AF 2899) represents a candidate that participated in the 2014 General Election. The committee was required to file a 2014 30 Day Post-General Report (30G) covering October 16, 2014 through November 24, 2014 (40 days). In order to determine the civil money penalty for the 2014 30 Day Post-General Report, an estimated level of activity was calculated using a per diem average by multiplying the previous activity reported for the 2013-2014 election cycle (\$135,390) by 8.47% (the number of days required in 30G (40) divided by the number of days included in the Committee's 2013-2014 election cycle reports (472)).

The committee (AF 2900) represents a candidate that participated in the 2014 General Election. The committee was required to file a 2014 30 Day Post-General Report (30G) covering October 16, 2014 through November 24, 2014 (40 days). In order to determine the civil money penalty for the 2014 30 Day Post-General Report, an estimated level of activity was calculated using a per diem average by multiplying the previous activity reported for the 2013-2014 election cycle (\$284,926) by 8.47% (the number of days required in 30G (40) divided by the number of days included in the Committee's 2013-2014 election cycle reports (472)).

The committee (AF 2902) represents a candidate that participated in the 2014 General Election. The committee was required to file a 2014 30 Day Post-General Report (30G) covering October 16, 2014 through November 24, 2014 (40 days). In order to determine the civil money penalty for the 2014 30 Day Post-General Report, an estimated level of activity was calculated using a per diem average by multiplying the previous activity reported for the 2013-2014 election cycle (\$283,781) by 6.13% (the number of days required in 30G (40) divided by the number of days included in the Committee's 2013-2014 election cycle reports (653)).

The committee (AF 2903) represents a candidate that participated in the 2014 General Election. The committee was required to file a 2014 30 Day Post-General Report (30G) covering October 16, 2014 through November 24, 2014 (40 days). In order to determine the civil money penalty for the 2014 30 Day Post-General Report, an estimated level of activity was calculated using a per diem average by multiplying the previous activity reported for the 2013-2014 election cycle (\$119,177) by 43.4% (the number of days required in 30G (40) divided by the number of days included in the Committee's 2013-2014 election cycle reports (92)).

### **Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

2025 RELEASE UNDER E.O. 14176

1/30/2015 2:44 PM

Federal Election Commission  
Reason to Believe Circulation Report  
2014 POST-GENERAL Not Election Sensitive 12/04/2014 AUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2895	C00566919	CURT GOTTSALL CAMPAIGN	GOTTSALL, CURT	CURT GOTTSALL	\$153,062	0	12/17/2014	13	\$22,897	\$175
2896	C00548453	DOC MOYLAN GOES TO WASHINGTON ELECTION COMMITTEE	MOYLAN, DAVID JOHN III MD	ROBERT BEAUVAIS	\$154,934	0		Not Filed	\$14,052 (est)	\$550
2897	C00559260	GAGNIER FOR CONGRESS 2014	GAGNIER, CHRISTINA	CHRISTINA GAGNIER	\$166,112	0	12/22/2014	18	\$13,045	\$200
2898	C00551317	LARRY SMITH VETERAN FOR CONGRESS	SMITH, LARRY STANLEY	LARRY STANLEY SMITH	\$245,685	0	12/12/2014	8	\$15,481	\$150
2899	C00546806	LOUIE MINOR FOR CONGRESS	MINOR, LOUIE JR	ANNA VAZQUEZ	\$135,390	0		Not Filed	\$11,467 (est)	\$550
2900	C00549824	ROBLES FOR CONGRESS	ROBLES, LUZ M	SILVIA CASTRO	\$284,926	0		Not Filed	\$24,133 (est)	\$550
2901	C00543538	RON LEACH FOR CONGRESS CAMPAIGN COMMITTEE	LEACH, RONALD ALLEN	THERESA DRAKE	\$295,343	0	12/31/2014	27	\$69,889	\$2,827
2902	C00499137	SHARON SUND FOR CONGRESS	SUND, SHARON	CONRAD SEGAL	\$283,781	0		Not Filed	\$17,395 (est)	\$550
2903	C00586331	WADE FOR US SENATE 14	WADE, KEVIN L	JAMES PICCONI	\$119,177	0		Not Filed	\$51,722 (est)	\$2,970

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reason To Believe Recommendation –	)	
2014 30 Day Post-General Report	)	
(Authorized Committees) for the	)	
Administrative Fine Program:	)	
CURT GOTTSALL CAMPAIGN, and	)	AF# 2895
CURT GOTTSALL as treasurer;	)	
DOC MOYLAN GOES TO	)	AF# 2896
WASHINGTON ELECTION	)	
COMMITTEE, and ROBERT BEAUVAIS	)	
as treasurer;	)	
GAGNIER FOR CONGRESS 2014, and	)	AF# 2897
GAGNIER, CHRISTINA as treasurer;	)	
LARRY SMITH VETERAN FOR	)	AF# 2898
CONGRESS, and LARRY STANLEY	)	
SMITH as treasurer;	)	
LOUIE MINOR FOR CONGRESS, and	)	AF# 2899
ANNA VAZQUEZ as treasurer;	)	
ROBLES FOR CONGRESS, and SILVIA	)	AF# 2900
CASTRO as treasurer;	)	
RON LEACH FOR CONGRESS	)	AF# 2901
CAMPAIGN COMMITTEE, and DRAKE,	)	
THERESA MS as treasurer;	)	
SHARON SUND FOR CONGRESS, and	)	AF# 2902
CONRAD SEGAL as treasurer;	)	
WADE FOR US SENATE 14, and JAMES	)	AF# 2903
PICCONI as treasurer;	)	

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on February 03, 2015 the Commission took the following actions on the Reason To Believe Recommendation – 2014 30 Day Post-General Report (Authorized Committees) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated January 30, 2015, on the following committees:

AF#2895 Decided by a vote of 6-0 to: (1) find reason to believe that CURT GOTTSBALL CAMPAIGN, and CURT GOTTSBALL as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2896 Decided by a vote of 6-0 to: (1) find reason to believe that DOC MOYLAN GOES TO WASHINGTON ELECTION COMMITTEE, and ROBERT BEAUVAIS as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2897 Decided by a vote of 6-0 to: (1) find reason to believe that GAGNIER FOR CONGRESS 2014, and GAGNIER, CHRISTINA as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2898 Decided by a vote of 6-0 to: (1) find reason to believe that LARRY SMITH VETERAN FOR CONGRESS, and LARRY STANLEY SMITH as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2899 Decided by a vote of 6-0 to: (1) find reason to believe that LOUIE MINOR FOR CONGRESS, and ANNA VAZQUEZ as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2900 Decided by a vote of 6-0 to: (1) find reason to believe that ROBLES FOR CONGRESS, and SILVIA CASTRO as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2901 Decided by a vote of 6-0 to: (1) find reason to believe that RON LEACH FOR CONGRESS CAMPAIGN COMMITTEE, and DRAKE, THERESA MS as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2902 Decided by a vote of 6-0 to: (1) find reason to believe that SHARON SUND FOR CONGRESS, and CONRAD SEGAL as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2903 Decided by a vote of 6-0 to: (1) find reason to believe that WADE FOR US SENATE 14, and JAMES PICCONI as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

February 4, 2015  
Date

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





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 4, 2015

Silvia Castro, in official capacity as Treasurer  
Robles for Congress  
1004 N Morton Drive  
Salt Lake City, UT 84116

C00549824  
AF#: 2900

Dear Ms. Castro:

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 October 16, 2014 through November 24, 2014, shall be filed no later than December 4, 2014. 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)). 52 U.S.C. § 30109(a)(4) (formerly 2 U.S.C. 437g(a)(4)). On February 3, 2015, the FEC found that there is reason to believe ("RTB") that Robles for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) by failing to file timely this report on or before December 4, 2014. 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 \$550. 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 \$550 is due within forty (40) days of the finding, or by March 15, 2015, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$24,133  
Number of Days Late: Not Filed  
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 to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or March 15, 2015. 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 52 U.S.C. § 30109 (formerly 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 Robles for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 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.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

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

**5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. 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 assesses 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.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2) (formerly 2 U.S.C. § 437g(a)(2)). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) (formerly 2 U.S.C. § 437g(a)(4)(B)) and 30109(a)(12)(A) (formerly 437g(a)(12)(A)) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

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,



Ann M. Ravel  
Chair

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**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 \$550 for the 2014 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 15, 2015. 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**  
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FOR: Robles for Congress

FEC ID#: C00549824

AF#: 2900

PAYMENT DUE DATE: March 15, 2015

PAYMENT AMOUNT DUE: \$550



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION

2015 JUL 24 AM 8:55

July 23, 2015

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *KDR* Kristin D. Roser/Sari Pickerall *UP*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2014 30 Day Post-General Report (Authorized Committees)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2014 30 Day Post-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, Ron Leach for Congress Campaign Committee (AF 2901) made only a partial payment of the civil money penalty assessed at the RTB stage. As such, the civil money penalty is listed as not paid.



7/23/2015 5:01 PM

Federal Election Commission  
FD Circulation Report Fine Paid  
2014 POST-GENERAL Not Election Sensitive 12/04/2014 AUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2885	CURT GOTTSALL CAMPAIGN	GOTTSALL, CURT	C00588919	CURT GOTTSALL	12/17/2014	13	\$22,897	0	02/03/2015	\$175	\$175	03/17/2015	\$175
2887	GAGNIER FOR CONGRESS 2014	GAGNIER, CHRISTINA	C00559280	CHRISTINA GAGNIER	12/22/2014	18	\$13,139	0	02/03/2015	\$200	\$200	03/17/2015	\$200
2898	LARRY SMITH VETERAN FOR CONGRESS	SMITH, LARRY STANLEY	C00551317	LARRY STANLEY SMITH	12/12/2014	8	\$15,481	0	02/03/2015	\$150	\$150	03/23/2015	\$150
2903	WADE FOR US SENATE 14	WADE, KEVIN L	C00589331	KEVIN WADE	01/26/2015	Not Filed	\$79,819	0	02/03/2015	\$2,970	\$2,970	02/19/2015	\$2,970

7/23/2015 5:02 PM

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2014 POST-GENERAL Not Election Sensitive 12/04/2014 AUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
2896	DOC MOYLAN GOES TO WASHINGTON ELECTION COMMITTEE	MOYLAN, DAVID JOHN III MD	C00548453	ROBERT BEALVAIS	03/16/2015	Not Filed	\$29,750	0	02/03/2015	\$550	170	\$550
2899	LOUIE MINOR FOR CONGRESS	MINOR, LOUIE JR	C00546606	ANNA VAZQUEZ		Not Filed	\$11,467 (est)	0	02/03/2015	\$550	170	\$550
2900	ROBLES FOR CONGRESS	ROBLES, LUZ M	C00549824	SILVIA CASTRO	03/11/2015	Not Filed	\$21,033	0	02/03/2015	\$550	170	\$550
2901	RON LEACH FOR CONGRESS CAMPAIGN COMMITTEE	LEACH, RONALD ALLEN	C00543538	THERESA DRAKE	12/31/2014	27	\$69,889	0	02/03/2015	\$2,827	170	\$2,827
2902	SHARON SUND FOR CONGRESS	SUND, SHARON	C00499137	EUGENE ROBERSON		Not Filed	\$17,395 (est)	0	02/03/2015	\$550	170	\$550



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program – Final )  
Determination Recommendation for 2014 )  
30 Day Post-General Report (Authorized )  
Committees): )  
CURT GOTTSALL CAMPAIGN, and ) AF# 2895  
CURT GOTTSALL as treasurer; )  
DOC MOYLAN GOES TO ) AF# 2896  
WASHINGTON ELECTION )  
COMMITTEE, and ROBERT BEAUVAIS )  
as treasurer; )  
GAGNIER FOR CONGRESS 2014, and ) AF# 2897  
GAGNIER, CHRISTINA as treasurer; )  
LARRY SMITH VETERAN FOR ) AF# 2898  
CONGRESS, and LARRY STANLEY )  
SMITH as treasurer; )  
LOUIE MINOR FOR CONGRESS, and ) AF# 2899  
ANNA VAZQUEZ as treasurer; )  
ROBLES FOR CONGRESS, and SILVIA ) AF# 2900  
CASTRO as treasurer; )  
RON LEACH FOR CONGRESS ) AF# 2901  
CAMPAIGN COMMITTEE, and DRAKE, )  
THERESA MS as treasurer; )  
SHARON SUND FOR CONGRESS, and ) AF# 2902  
ROBERSON, EUGENE as treasurer; )  
WADE FOR US SENATE 14, and KEVIN ) AF# 2903  
WADE as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 27, 2015 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for 2014 30 Day Post-General Report (Authorized Committees) as recommended in the Reports Analysis Division's Memorandum dated July 23, 2015, on the following committees:

AF#2895 Decided by a vote of 6-0 to: (1) make a final determination that CURT GOTTSALL CAMPAIGN, and CURT GOTTSALL as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2896 Decided by a vote of 6-0 to: (1) make a final determination that DOC MOYLAN GOES TO WASHINGTON ELECTION COMMITTEE, and ROBERT BEAUVAIS as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2897 Decided by a vote of 6-0 to: (1) make a final determination that GAGNIER FOR CONGRESS 2014, and GAGNIER, CHRISTINA as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2898 Decided by a vote of 6-0 to: (1) make a final determination that LARRY SMITH VETERAN FOR CONGRESS, and LARRY STANLEY SMITH as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2899 Decided by a vote of 6-0 to: (1) make a final determination that LOUIE MINOR FOR CONGRESS, and ANNA VAZQUEZ as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated;

(2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2900 Decided by a vote of 6-0 to: (1) make a final determination that ROBLES FOR CONGRESS, and SILVIA CASTRO as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2901 Decided by a vote of 6-0 to: (1) make a final determination that RON LEACH FOR CONGRESS CAMPAIGN COMMITTEE, and DRAKE, THERESA MS as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2902 Decided by a vote of 6-0 to: (1) make a final determination that SHARON SUND FOR CONGRESS, and ROBERSON, EUGENE as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2903 Decided by a vote of 6-0 to: (1) make a final determination that WADE FOR US SENATE 14, and KEVIN WADE as treasurer, violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

July 28, 2015  
Date

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 28, 2015

Silvia Castro, in official capacity as Treasurer  
Robles for Congress  
1004 N. Morton Drive  
Salt Lake City, UT 84116

C00549824  
AF#: 2900

Dear Ms. Castro:

On February 3, 2015, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Robles for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for filing late or failing to file the 2014 Post-General Report. By letter dated February 4, 2015, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$550 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, you were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. Since that time, the amount of the level of activity has been changed to reflect the actual level of activity of the 2014 Post-General Report. The FEC made a final determination on July 27, 2015 that Robles for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assessed a civil money penalty in the amount of \$550 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$21,033

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purposes 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 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 U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii) (formerly 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 52 U.S.C. § 30109 (formerly 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**

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. 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 52 U.S.C. § 30109(a)(12) (formerly 2 U.S.C. § 437g(a)(12)) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Sari Pickerall at Federal Election Commission, 999 E St., NW, Washington, DC 20463, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in black ink, appearing to read "Ann M. Ravel". The signature is fluid and cursive, with the first name "Ann" and middle initial "M" being more stylized than the last name "Ravel".

Ann M. Ravel  
Chair

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**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$550 for the 2014 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**

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FOR: Robles for Congress

FEC ID#: C00549824

REPORT: 2014 Post-General

AF#: 2900

PAYMENT AMOUNT DUE: \$550



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2900

DATE SCANNED 8/17/15

SCANNER NO. 2

SCAN OPERATOR SH