



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2970

DATE SCANNED 9/22/15

SCANNER NO. 2

SCAN OPERATOR JB/OF



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2015 APR -1 PM 5: 20

April 1, 2015

**SENSITIVE**

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *for PCO*  
Staff Director

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

Debbie Chacona *for PCO*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Reason To Believe Recommendation – 2014 Year-End Report for the  
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2014 Year-End Report in accordance with 52 U.S.C. § 30104(a). The Year-End Report was due on January 31, 2015.

The committees listed in the attached RTB Circulation Report either failed to file the report, no more than thirty (30) days after the due date (considered a late filed 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 C.F.R. 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 52 U.S.C. § 30104(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.

Federal Election Commission  
Reason to Believe Circulation Report  
2014 YEAR-END Not Election Sensitive 01/31/2015 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2953	C00546630	ABELERSENATE	ABELER, JAMES J	BART J. WARD	\$309,164	0	3/6/2015	Not Filed	\$8,601	\$330
2954	C00543074	BARFIELD FOR CONGRESS	BARFIELD, JONATHAN JR	TUFANNA L THOMAS	\$120,923	0	3/15/2015	Not Filed	\$658	\$275
2955	C00540385	BEALE FOR CONGRESS	BEALE, ANTHONY A	STEVEN R BURRIS	\$369,434	5		Not Filed	\$92,359 (est)	\$8,662
2956	C00559146	BELIEVE IN LIFE LIBERTY YOURSELF AKA BILLY PAC		RONALD NEVILLE	\$121,412	0		Not Filed	\$24,282 (est)	\$550

2958	C00550129	CALVIN D TURNQUEST FOR CONGRESS	TURNQUEST, CALVIN DEON	OLIVIA OUTMEZGUINE	\$112,964	1		Not Filed	\$37,655 (est)	\$1,362
2959	C00405852	CAM CAVASSO FOR U S SENATE	CAVASSO, CAMPBELL	RAYNETTE K NICHOLSON	\$628,063	0		Not Filed	\$62,806 (est)	\$2,970
2960	C00558601	CICOTTE FOR CONGRESS	CICOTTE, GEORGE FREDERICK	GEORGE FREDERICK CICOTTE	\$453,747	0		Not Filed	\$113,437 (est)	\$4,950
2961	C00460238	CUBIST PHARMACEUTICALS INC. PAC (CUBIST PAC)		MARK BATTALIGNI	\$194,531	0		Not Filed	\$17,685 (est)	\$550
2962	C00553297	DAN FREI FOR CONGRESS	FREI, DANIEL EDWARD	MATTHEW SAKALOSKY	\$102,720	0		Not Filed	\$20,544 (est)	\$550

2964	C00176420	DEMOCRATIC FOUNDATION OF ORANGE COUNTY		GLEN HATTON	\$268,359	0		Not Filed	\$42,187 (est)	\$1,090
2965	C00548453	DOC MOYLAN GOES TO WASHINGTON ELECTION COMMITTEE	MOYLAN, DAVID JOHN III MD	ROBERT BEAUVAIS	\$185,684	0	3/16/2015	Not Filed	\$1,000	\$275
2966	C00522821	EMPOWER CITIZENS NETWORK		ROBERT WAYNE WARTHER	\$102,072	0		Not Filed	\$20,414 (est)	\$550
2967	C00547067	ESPERO FOR CONGRESS	ESPERO, WILLIAM	BRYAN GALLARDE	\$225,170	0		Not Filed	\$45,034 (est)	\$1,090
2968	C00554345	FISCHER FOR CONGRESS	FISCHER, JAMES M	STACEY J. FANTAUZZI	\$297,553	0		Not Filed	\$49,592 (est)	\$1,090
2969	C00561688	FLINN FOR SENATE	FLINN, GEORGE SHEA	LLOYD HETZER	\$2,980,586	0		Not Filed	\$993,529 (est)	\$13,200
2970	C00148999	FRIENDS OF DICK DURBIN	DURBIN, RICHARD J	DOUGLAS A. DOUGHERTY	\$17,561,979	0	2/13/2015	13	\$170,433	\$2,930
2971	C00559054	IF HE VOTES LIKE THAT IN SALEM IMAGINE WHAT HE WILL DO IN CONGRESS		CAROL RUSSELL	\$228,068	0		Not Filed	\$32,581 (est)	\$1,090
2972	C00543033	JAY STAMPER FOR SENATE COMMITTEE	STAMPER, JEREMY MICHAEL	JEREMY M. STAMPER LESLIE	\$125,244	1		Not Filed	\$20,874 (est)	\$687
2973	C00560672	JETT FOR CONGRESS	JETT, SHANE DAVID	SUSANNE LANDWERT	\$151,331	0		Not Filed	\$37,833 (est)	\$1,090
2974	C00505800	JILL STEIN FOR PRESIDENT	STEIN, JILL	JAMES MORAN	\$230,734	5		Not Filed	\$11,537 (est)	\$1,237

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2975	C00545715	JORGE BONILLA FOR US CONGRESS INC	BONILLA, JORGE L JR	MAGDALENA BONILLA	\$270,955	2		Not Filed	\$54,191 (est)	\$4,455
2976	C00552513	KALEKA FOR CONGRESS	KALEKA, AMARDEEP	PETER BELLIN	\$312,974	0		Not Filed	\$62,595 (est)	\$2,970
2977	C00552992	KWASMAN FOR CONGRESS	KWASMAN, ADAM CHARLES	ADAM KWASMAN	\$619,532	0	2/19/2015	19	\$21,000	\$205
2978	C00553958	LARRY WILSKES FOR CONGRESS	WILSKES, LARRY ALBERT	ANTHONY ELLIOTT STEWART	\$406,466	0	2/27/2015	27	\$715	\$162
2979	C00548024	LORENZO 'LARRY' PALOMARES-STARBUCK FOR CONGRESS	PALOMARES-STARBUCK, LORENZO 'LARRY'	ELY CESAR	\$161,220	0		Not Filed	\$80,610 (est)	\$3,850
2980	C00546606	LOUIE MINOR FOR CONGRESS	MINOR, LOUIE JR	ANNA VAZQUEZ	\$135,391	0		Not Filed	\$19,342 (est)	\$550
2981	C00545301	MARJORIE 2014	MARGOLIES-MEZVINSKY, MARJORIE	JENNIFER MAY	\$2,918,618	0	3/19/2015	Not Filed	\$6,524	\$330
2982	C00564724	MCCLINE FOR CONGRESS	MCCLINE, JAMEEL	TRINE ANDERSEN	\$149,352	0		Not Filed	\$74,676 (est)	\$2,970
2983	C00343590	MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (MCA-PAC)		JOHN MCNERNEY P.	\$230,556	0	3/3/2015	Not Filed	\$2,873	\$275
2984	C00553420	NEW MEXICANS FOR RICHARD PRIEM	PRIEM, RICHARD G	PATTI RIVAS	\$207,589	0		Not Filed	\$51,897 (est)	\$2,970
2985	C00568246	OUR VOICES MATTER		CHARLES PASCAL	\$100,037	0		Not Filed	\$100,037 (est)	\$4,950
2986	C00509489	PATRIOT SUPER PAC		THOMAS FREILING	\$116,793	1		Not Filed	\$23,359 (est)	\$687
2987	C00261891	REPUBLICAN CENTRAL COMMITTEE OF LOS ANGELES COUNTY (FED. ACCT)		ALBERT GERSH	\$478,815	3		Not Filed	\$5,347 (est)	\$577
2988	C00547299	RICHARD BOLGER FOR CONGRESS	BOLGER, RICHARD OWEN	JAMES B. VELTRI	\$235,024	1		Not Filed	\$47,005 (est)	\$1,362
2989	C00549824	ROBLES FOR CONGRESS	ROBLES, LUZ M	SILVIA CASTRO	\$314,322	0	3/11/2015	Not Filed	\$8,543	\$330
2990	C00557694	SCOTT BRION FOR CONGRESS	BRION, SCOTT FLOYD	ERIC J. LOUDENSLAGER	\$385,242	0	3/4/2015	Not Filed	\$11,504	\$550
2991	C00558312	SEND LARA TO CONGRESS	LARA, BRIAN	BRIAN LARA	\$236,197	0		Not Filed	\$59,049 (est)	\$2,970
2992	C00499137	SHARON SUND FOR CONGRESS	SUND, SHARON	EUGENE ROBERSON	\$283,782	1		Not Filed	\$31,531 (est)	\$1,362

2994	C00560649	TOM CARTER FOR CONGRESS	CARTER, THOMAS G	THOMAS CARTER	\$411,859	0		Not Filed	\$137,286 (est)	\$4,950
2995	C00548701	WALTERS FOR CONGRESS	WALTERS, RONALD NEAL JR	MICHAEL E. GREENLEAF	\$261,156	0		Not Filed	\$43,526 (est)	\$1,090
2996	C00553545	WES NEUMAN FOR CONGRESS	NEUMAN, WESLEY RYAN	LINDA NEUMAN	\$107,255	0		Not Filed	\$17,876 (est)	\$550

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation - 2014 )  
Year-End Report of the Administrative Fine )  
Program: )  
ABELER4SENATE, and BART J WARD ) AF# 2953  
as treasurer; )  
BARFIELD FOR CONGRESS, and ) AF# 2954  
TUFANNA L THOMAS as treasurer; )  
BEALE FOR CONGRESS, and STEVEN R ) AF# 2955  
BURRIS as treasurer; )  
BELIEVE IN LIFE LIBERTY YOURSELF ) AF# 2956  
AKA BILLY PAC, and RONALD )  
NEVILLE as treasurer; )

CALVIN D TURNQUEST FOR ) AF# 2958  
CONGRESS, and OLIVIA )  
OUTMEZGUINE as treasurer; )  
CAM CAVASSO FOR U S SENATE, and ) AF# 2959  
RAYNETTE K NICHOLSON as treasurer; )  
CICOTTE FOR CONGRESS, and ) AF# 2960  
GEORGE FREDERICK CICOTTE as )  
treasurer; )  
CUBIST PHARMACEUTICALS INC. ) AF# 2961  
PAC (CUBIST PAC), and MARK )  
BATTALIGNI as treasurer; )  
DAN FREI FOR CONGRESS, and ) AF# 2962  
SAKALOSKY, MATTHEW as treasurer; )

DEMOCRATIC FOUNDATION OF ) AF# 2964  
ORANGE COUNTY, and HATTON, )  
GLEN as treasurer; )

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DOC MOYLAN GOES TO WASHINGTON ELECTION COMMITTEE, and ROBERT BEAUVAIS as treasurer; AF# 2965  
EMPOWER CITIZENS NETWORK, and ROBERT WAYNE WARTHER as treasurer; ) AF# 2966  
ESPERO FOR CONGRESS, and GALLARDE, BRYAN as treasurer; ) AF# 2967  
FISCHER FOR CONGRESS, and FANTAUZZI, STACEY J. as treasurer; ) AF# 2968  
FLINN FOR SENATE, and LLOYD HETZER as treasurer; ) AF# 2969  
FRIENDS OF DICK DURBIN, and DOUGLAS A DOUGHERTY as treasurer; ) AF# 2970  
IF HE VOTES LIKE THAT IN SALEM IMAGINE WHAT HE WILL DO IN CONGRESS, and CAROL RUSSELL as treasurer; ) AF# 2971  
JAY STAMPER FOR SENATE COMMITTEE, and JEREMY M STAMPER as treasurer; ) AF# 2972  
JETT FOR CONGRESS, and LESLIE SUSANNE LANDWERT as treasurer; ) AF# 2973  
JILL STEIN FOR PRESIDENT, and MORAN, JAMES as treasurer; ) AF# 2974  
JORGE BONILLA FOR US CONGRESS INC, and MAGDALENA BONILLA as treasurer; ) AF# 2975  
KALEKA FOR CONGRESS, and BELLIN, PETER as treasurer; ) AF# 2976  
KWASMAN FOR CONGRESS, and KWASMAN, ADAM as treasurer; ) AF# 2977  
LARRY WILSKE FOR CONGRESS, and STEWART, ANTHONY ELLIOTT as treasurer; ) AF# 2978  
LORENZO 'LARRY' PALOMARES-STARBUCK FOR CONGRESS, and ELY CESAR as treasurer; ) AF# 2979  
LOUIE MINOR FOR CONGRESS, and ANNA VAZQUEZ as treasurer; ) AF# 2980  
MARJORIE 2014, and JENNIFER MAY as treasurer; ) AF# 2981  
MCCLINE FOR CONGRESS, and TRINE ANDERSEN as treasurer; ) AF# 2982

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MECHANICAL CONTRACTORS ) AF# 2983  
ASSOCIATION OF AMERICA )  
POLITICAL ACTION COMMITTEE )  
(MCA-PAC), and JOHN, MCNERNEY P. )  
as treasurer; )  
NEW MEXICANS FOR RICHARD ) AF# 2984  
PRIEM, and PATTI RIVAS as treasurer; )  
OUR VOICES MATTER, and CHARLES ) AF# 2985  
PASCAL as treasurer; )  
PATRIOT SUPER PAC, and FREILING, ) AF# 2986  
THOMAS as treasurer; )  
REPUBLICAN CENTRAL COMMITTEE ) AF# 2987  
OF LOS ANGELES COUNTY (FED. )  
ACCT.), and ALBERT GERSH as )  
treasurer; )  
RICHARD BOLGER FOR CONGRESS, ) AF# 2988  
and JAMES B. VELTRI as treasurer; )  
ROBLES FOR CONGRESS, and SILVIA ) AF# 2989  
CASTRO as treasurer; )  
SCOTT BRION FOR CONGRESS, and ) AF# 2990  
ERIC J LOUDENSLAGER as treasurer; )  
SEND LARA TO CONGRESS, and ) AF# 2991  
BRIAN LARA as treasurer; )  
SHARON SUND FOR CONGRESS, and ) AF# 2992  
ROBERSON, EUGENE as treasurer; )

TOM CARTER FOR CONGRESS, and ) AF# 2994  
CARTER, THOMAS as treasurer; )  
WALTERS FOR CONGRESS, and ) AF# 2995  
MICHAEL E GREENLEAF as treasurer; )  
WES NEUMAN FOR CONGRESS, and ) AF# 2996  
LINDA NEUMAN as treasurer; )

CERTIFICATION

I, Shelley E. Garr, Deputy Secretary of the Federal Election Commission, do hereby certify that on April 03, 2015 the Commission took the following actions on the Reason To Believe Recommendation - 2014 Year-End Report of the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated April 01, 2015, on the following committees:

AF#2953 Decided by a vote of 6-0 to: (1) find reason to believe that ABELER4SENATE, and BART J WARD 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#2954 Decided by a vote of 6-0 to: (1) find reason to believe that BARFIELD FOR CONGRESS, and TUFANNA L THOMAS 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#2955 Decided by a vote of 6-0 to: (1) find reason to believe that BEALE FOR CONGRESS, and STEVEN R BURRIS 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#2956 Decided by a vote of 6-0 to: (1) find reason to believe that BELIEVE IN LIFE LIBERTY YOURSELF AKA BILLY PAC, and RONALD NEVILLE 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#2958 Decided by a vote of 6-0 to: (1) find reason to believe that CALVIN D TURNQUEST FOR CONGRESS, and OLIVIA OUTMEZGUINE 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#2959 Decided by a vote of 6-0 to: (1) find reason to believe that CAM CAVASSO FOR U S SENATE, and RAYNETTE K NICHOLSON 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#2960 Decided by a vote of 6-0 to: (1) find reason to believe that CICOTTE FOR CONGRESS, and GEORGE FREDERICK CICOTTE 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#2961 Decided by a vote of 6-0 to: (1) find reason to believe that CUBIST PHARMACEUTICALS INC. PAC (CUBIST PAC), and MARK BATTALIGNI 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#2962 Decided by a vote of 6-0 to: (1) find reason to believe that DAN FREI FOR CONGRESS, and SAKALOSKY, MATTHEW 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#2964 Decided by a vote of 6-0 to: (1) find reason to believe that DEMOCRATIC FOUNDATION OF ORANGE COUNTY, and HATTON, GLEN 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#2965 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#2966 Decided by a vote of 6-0 to: (1) find reason to believe that EMPOWER CITIZENS NETWORK, and ROBERT WAYNE WARTHER 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#2967 Decided by a vote of 6-0 to: (1) find reason to believe that ESPERO FOR CONGRESS, and GALLARDE, BRYAN 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#2968 Decided by a vote of 6-0 to: (1) find reason to believe that FISCHER FOR CONGRESS, and FANTAUZZI, STACEY J. 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#2969 Decided by a vote of 6-0 to: (1) find reason to believe that FLINN FOR SENATE, and LLOYD HETZER 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#2970 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF DICK DURBIN, and DOUGLAS A DOUGHERTY 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#2971 Decided by a vote of 6-0 to: (1) find reason to believe that IF HE VOTES LIKE THAT IN SALEM IMAGINE WHAT HE WILL DO IN CONGRESS, and CAROL RUSSELL 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#2972 Decided by a vote of 6-0 to: (1) find reason to believe that JAY STAMPER FOR SENATE COMMITTEE, and JEREMY M STAMPER 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#2973 Decided by a vote of 6-0 to: (1) find reason to believe that JETT FOR CONGRESS, and LESLIE SUSANNE LANDWERT 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#2974 Decided by a vote of 6-0 to: (1) find reason to believe that JILL STEIN FOR PRESIDENT, and MORAN, JAMES 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#2975 Decided by a vote of 6-0 to: (1) find reason to believe that JORGE BONILLA FOR US CONGRESS INC, and MAGDALENA BONILLA 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#2976 Decided by a vote of 6-0 to: (1) find reason to believe that KALEKA FOR CONGRESS, and BELLIN, PETER 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#2977 Decided by a vote of 6-0 to: (1) find reason to believe that KWASMAN FOR CONGRESS, and KWASMAN, ADAM 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#2978 Decided by a vote of 6-0 to: (1) find reason to believe that LARRY WILSKE FOR CONGRESS, and STEWART, ANTHONY ELLIOTT 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#2979 Decided by a vote of 6-0 to: (1) find reason to believe that LORENZO 'LARRY' PALOMARES-STARBUCK FOR CONGRESS, and ELY CESAR 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#2980 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#2981 Decided by a vote of 6-0 to: (1) find reason to believe that MARJORIE 2014, and JENNIFER MAY 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#2982 Decided by a vote of 6-0 to: (1) find reason to believe that MCCLINE FOR CONGRESS, and TRINE ANDERSEN 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#2983 Decided by a vote of 6-0 to: (1) find reason to believe that MECHANICAL CONTRACTORS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (MCA-PAC), and JOHN, MCNERNEY P. 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#2984 Decided by a vote of 6-0 to: (1) find reason to believe that NEW MEXICANS FOR RICHARD PRIEM, and PATTI RIVAS 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#2985 Decided by a vote of 6-0 to: (1) find reason to believe that OUR VOICES MATTER, and CHARLES PASCAL 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#2986 Decided by a vote of 6-0 to: (1) find reason to believe that PATRIOT SUPER PAC, and FREILING, THOMAS 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#2987 Decided by a vote of 6-0 to: (1) find reason to believe that REPUBLICAN CENTRAL COMMITTEE OF LOS ANGELES COUNTY (FED. ACCT.), and ALBERT GERSH 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#2988 Decided by a vote of 6-0 to: (1) find reason to believe that RICHARD BOLGER FOR CONGRESS, and JAMES B. VELTRI 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#2989 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#2990 Decided by a vote of 6-0 to: (1) find reason to believe that SCOTT BRION FOR CONGRESS, and ERIC J LOUDENSLAGER 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#2991 Decided by a vote of 6-0 to: (1) find reason to believe that SEND LARA TO CONGRESS, and BRIAN LARA 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#2992 Decided by a vote of 6-0 to: (1) find reason to believe 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 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#2994 Decided by a vote of 6-0 to: (1) find reason to believe that TOM CARTER FOR CONGRESS, and CARTER, THOMAS 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#2995 Decided by a vote of 6-0 to: (1) find reason to believe that WALTERS FOR CONGRESS, and MICHAEL E GREENLEAF 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#2996 Decided by a vote of 6-0 to: (1) find reason to believe that WES NEUMAN FOR CONGRESS, and LINDA NEUMAN 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:

April 6, 2015  
Date

Shelley E. Garr  
Shelley E. Garr  
Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 6, 2015

Douglas A Dougherty, in official capacity as Treasurer  
Friends of Dick Durbin  
P.O. Box 1949  
Springfield, IL 62705

C00148999  
AF#: 2970

Dear Mr. Dougherty:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year-End Report of Receipts and Disbursements every calendar year. This report, covering the period November 25, 2014 through December 31, 2014, shall be filed no later than January 31, 2015. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on February 13, 2015, thirteen (13) days late.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On April 3, 2015, the FEC found that there is reason to believe ("RTB") that Friends of Dick Durbin and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before January 31, 2015. 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 \$2,930. 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 \$2,930 is due within forty (40) days of the finding, or by May 13, 2015, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$170,433  
Number of Days Late: 13  
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 May 13, 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. 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 Friends of Dick Durbin and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(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 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). 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) and 30109(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

-----  
**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 \$2,930 for the 2014 Year-End 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 May 13, 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**  
-----

FOR: Friends of Dick Durbin

FEC ID#: C00148999

AF#: 2970

PAYMENT DUE DATE: May 13, 2015

PAYMENT AMOUNT DUE: \$2,930

# Dick Durbin

U.S. SENATOR 

FEC OFFICE OF  
ADMIN REVIEW

2015 JUN -9 PM 1:42

April 13, 2015

Ann Mr. Ravel  
Chair  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

RE: Friends of Dick Durbin Committee ID #C00148999  
AF# 2970

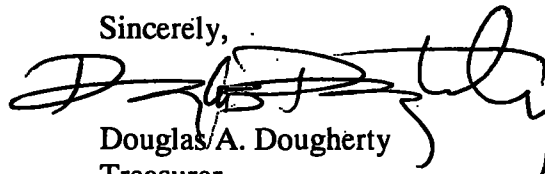
Dear Ms. Ravel:

I am writing in response to your letter of April 6 regarding the Friends of Dick Durbin's Year End Report. The report was mailed on January 23, 2015 by Certified Mail, 8 days before the deadline. Attached are the Certified Mail and Postal Receipts.

Several weeks after the deadline, I received a phone call from the Office of Public Records that the report had not been received. I told them I had the receipts and they asked me to get a copy of the report to the Office of Public Records as soon as possible. A colleague in DC took a report over that day.

If you need additional information regarding this matter, please feel free to contact me at 217-414-0341 or 217-553-2781.

Sincerely,



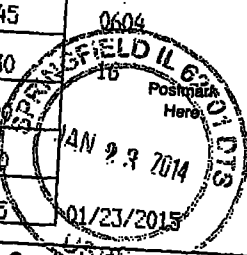
Douglas A. Dougherty  
Treasurer  
Friends of Dick Durbin Committee

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Postage	\$ 2.45
Certified Fee	\$3.30
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
<b>Total Postage &amp; Fees</b>	<b>\$ 5.75</b>



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**OFFICE OF PUBLIC RECORDS**  
 Street & Apt. No.,  
 or PO Box No. **P.O. BOX 77578**  
 City, State, ZIP+4 **WASHINGTON, DC 20013-7578**  
 PS Form 3800, July 2014 See Reverse for Instructions

SPRINGFIELD DWN TWN STA  
 SPRINGFIELD, Illinois  
 627019998

1615500604-0097

01/23/2015 (217)753-3432 12:39:15 PM

**Sales Receipt**

Product Description	Sale Unit Qty Price	Final Price
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WASHINGTON DC 20013-8578 \$2.45  
 Zone-5

First-Class Mail Large Env  
 7.80 oz.

Expected Delivery: Mon 01/26/15

@@ Certified \$3.30

USPS Certified Mail #:  
 70141820000019169489

Issue Postage: \$5.75

Total: \$5.75

Paid by:

Cash \$10.00

Change Due: -\$4.25

@@ For tracking or inquiries go to  
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 other information call



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 12, 2015

Douglas A. Dougherty, Treasurer  
Friends of Dick Durbin  
P.O. Box 1949  
Springfield, IL 62705

C00148999  
AF#: 2970

Dear Mr. Dougherty:

On June 9, 2015, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") for Friends of Dick Durbin and you, in your official capacity as Treasurer, which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

Sincerely,

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

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION

2015 AUG 10 AM 10:31

**SENSITIVE**

August 7, 2015

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *AP*  
Staff Director

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

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Reviewing Officer Recommendation in AF# 2970 – Friends of Dick Durbin and Anne Dougherty, in her official capacity as Treasurer (C00148999)

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.

Please note, the Committee filed an Amended Statement of Organization (FEC Form 1) on June 26, 2015 to disclose Anne Dougherty as the current Treasurer. The Reviewing Officer Recommendation reflects the change in Treasurer after RTB, listing the current respondents as Friends of Dick Durbin and Anne Dougherty, in her official capacity as Treasurer.

Attachment



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 7, 2015

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

AF# 2970 – Friends of Dick Durbin and Anne Dougherty, in her official capacity as Treasurer  
(C00148999)

**Summary of Recommendation**

Take no further action that the respondents violated 52 U.S.C. § 30104(a) and close the file.

**Reason-to-Believe Background**

The 2014 Year-End Report was due on January 31, 2015. At the time of RTB, Commission records indicated the respondents filed the report on February 13, 2015, 13 days late. The report is not election sensitive and was considered filed within 30 days of the due date; therefore, the report was considered late. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On April 3, 2015, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2014 Year-End Report and made a preliminary determination that the civil money penalty was \$2,930 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 April 6, 2015 to notify them of the Commission's RTB finding and civil money penalty.

**Legal Requirements**

The Federal Election Campaign Act ("Act") states that the treasurer of a principal campaign committee shall file a report for the quarter ending December 31 no later than January 31 of the following calendar year. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(a)(1)(i). All reports required to be filed by the principal campaign committee of a candidate for the office of U.S. Senator shall be filed with the Secretary of the Senate. 52 U.S.C. § 30102(g) and 11 C.F.R. § 105.2. If the report is sent by registered or certified mail, by Express or Priority Mail with delivery confirmation or by overnight delivery service with an online tracking system, and scheduled for next business day delivery, it must be postmarked, or deposited with the mailing service, no later than the filing date to be timely filed. 52 U.S.C. § 30104(a)(5), and 11 C.F.R. §§ 100.19 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 June 9, 2015, the Commission received the written response ("challenge") from the Committee's Treasurer at the time, Mr. Doug Dougherty. He states that the Committee mailed the 2014 Year-End Report via U.S.P.S Certified Mail on January 23, 2015. Copies of supporting documentation were included with the challenge.

Mr. Dougherty also states that several weeks after the filing deadline, the Secretary of the Senate's Office of Public Records ("OPR") informed the Committee that it had not received the 2014 Year-End Report. That same day, the Committee hand-delivered a copy of the report to OPR.

## Analysis

At the time of RTB, the Commission's record indicated OPR first received the Committee's 2014 Year-End Report via hand-delivery on February 13, 2015, 13 days late. Therefore, RAD recommended that the Commission include the respondents in the Administrative Fine Program RTB findings for the 2014 Year-End Report. On April 3, 2015, the Commission found RTB that the respondents violated the Act and made a preliminary determination that the civil money penalty was \$2,930.

However, the supporting documentation included with the respondents' challenge provides evidence that the Committee timely mailed the 2014 Year-End Report via USPS Certified Mail.<sup>1</sup> The USPS tracking details indicate the report was mailed on January 23, 2015, 8 days prior to the filing deadline, but it was not ultimately delivered to OPR until February 27, 2015.

On August 4, 2015, the Reviewing Officer requested OPR provide additional details regarding their receipt of this report. OPR explained that USPS erroneously delivered the package to another location on February 11, 2015. The package was not delivered to OPR until February 27, 2015, on which date OPR electronically transmitted the report to the Commission for public disclosure.

According to the Assistant Staff Director of RAD, the Commission did receive the electronic transmission of the file on February 27, 2015. Upon receipt, Processing Branch staff reviewed OPR's envelope replacement page, which noted the USPS Certified Mail postmark date was February 23, 2015. The Processing Branch made the decision to not post this report to the Committee's filing index because it appeared to be a duplicate of the hand-delivered report previously received on February 13, 2015.

However, OPR erroneously marked the postmark date as February 23, 2015 instead of January 23, 2015. Therefore, this version of the report should have been considered received on January 23, 2015 and posted to the Committee's filing index as its original 2014 Year-End Report. The Commission has made the necessary adjustments to correct the record. The Committee's filing index now accurately displays the original 2014 Year-End Report as received on January 23,

<sup>1</sup> The receipt date is considered to be the postmark date for reports mailed via USPS Certified Mail pursuant to 52 U.S.C. § 30104(a)(5).

2015. In addition, the hand-delivered version of the report received on February 13, 2015 is now displayed as a Miscellaneous Document.

Given the Commission's record was incomplete, and the 2014 Year-End Report was mailed timely via USPS Certified Mail, a "safe harbor" delivery method outlined in 52 U.S.C. § 30104(a)(5), the Commission's RTB finding was based on a factual error. 11 C.F.R. § 111.35(b)(1). Therefore, the Reviewing Officer recommends that the Commission take no further action and close the file.

### **OAR Recommendations**

- (1) Take no further action in AF# 2970 that Friends of Dick Durbin and Anne Dougherty, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file; and
- (2) Send the appropriate letter.

Reviewing Officer: Rhiannon Magruder

### **Attachments**

- Attachment 1 –
- Attachment 2 –
- Attachment 3 –
- Attachment 4 –
- Attachment 5 – Declaration from RAD
- Attachment 6 – Declaration from OAR

DECLARATION OF KRISTIN D. ROSER

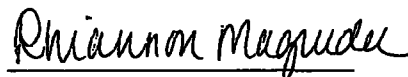
1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge 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 Friends of Dick Durbin:
  - A) Reason-to-Believe Letter, dated April 6, 2015 referencing the 2014 Year-End Report (sent via overnight mail to the address of record).
3. I hereby certify that I have searched the Commission's public records and find that Friends of Dick Durbin filed the 2014 Year-End Report with the Commission on February 13, 2015.
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 8<sup>th</sup> day of July, 2015.

*Kristin D. Roser*

Kristin D. Roser  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission

### DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) The principal campaign committee of a candidate must file a report for the quarter ending December 31 no later than January 31 of the following calendar year. If the report is sent by registered or certified mail, by Express or Priority Mail with delivery confirmation or by overnight delivery service with an online tracking system, and scheduled for next business day delivery, it must be postmarked, or deposited on the filing date to be timely filed. Reports sent by first class mail must be received by the close of business on the filing date to be timely filed. All reports required to be filed by the principal campaign committee of a candidate for the office of U.S. Senator shall be filed with the Secretary of the Senate.
- 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 FECFile 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) Amended Statement of Organization received on June 26, 2015 listing Annie Dougherty as Treasurer.
  - b) Cover Page, Summary Page, Detailed Summary Pages, and Secretary of Senate Envelope Replacement Page of the 2014 Year-End Report filed by Friends of Dick Durbin. According to the Commission's records, the document was received on February 13, 2015 and covers the period of November 25 through December 31, 2014.
  - c) Cover Page, Summary Page, Detailed Summary Pages, and Secretary of Senate Envelope Replacement Page of the 2014 Year-End Report filed by Friends of Dick Durbin. According to the Commission's records, the document was delivered on February 27, 2015, considered received on January 23, 2015, and covers the period of November 25 through December 31, 2014.
- 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, D.C. on the 7th day of August, 2015.



Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

FEC  
FORM 1

STATEMENT OF  
ORGANIZATION

SECRETARY OF THE SENATE

15 JUL -2 PM 1:32

Office Use Only

1. NAME OF  
COMMITTEE (in full)

☐

(Check if name  
is changed)

Example: If typing, type  
over the lines.

12FE4M5

Friends of Dick Durbin Committee

ADDRESS (number and street)

P.O. Box 1949

☐

(Check if address  
is changed)

Springfield

IL

62705

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

☐

(Check if address  
is changed)

annied1408@sbcglobal.net

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐

(Check if address  
is changed)

www.dickdurbin.com

2. DATE

06

1

1981

3. FEC IDENTIFICATION NUMBER

C00148999

4. IS THIS STATEMENT

☐

NEW (N)

OR

☒

AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Anne Dougherty

Signature of Treasurer

Anne Dougherty

Date

06

26

2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office  
Use  
Only

For further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-694-1100

FEC FORM 1  
(Revised 02/2009)

15020179273

## 5. TYPE OF COMMITTEE

## Candidate Committee:

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Richard J. Durbin

Candidate Party Affiliation

DEM

Office Sought:

☐ House☒ Senate☐ President

State

IL

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

## Party Committee:

- (d) ☐ This committee is a  (National, State or subordinate) committee of the  (Democratic, Republican, etc.) Party.

## Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization
- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

## Joint Fundraising Representative:

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

## Committees Participating in Joint Fundraiser

1.	<input type="text"/>	FEC ID number	C
2.	<input type="text"/>	FEC ID number	C
3.	<input type="text"/>	FEC ID number	C
4.	<input type="text"/>	FEC ID number	C

15020179274

15020179274

Write or Type Committee Name

Friends of Dick Durbin Committee

## 6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Durbin Senate Victory Fund

Mailing Address

120 Maryland Ave.

Washington

CITY

DC

STATE

20002

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☒ Joint Fundraising Representative ☐ Leadership PAC Sponsor

## 7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Anne Dougherty

Mailing Address

1408 Dial Ct.

Springfield

CITY

IL

STATE

62705

ZIP CODE

Title or Position

Treasurer

Telephone number

217 - 787 - 7476

## 8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name  
of Treasurer

Anne Dougherty

Mailing Address

1408 Dial Ct.

Springfield

CITY

IL

STATE

62704

ZIP CODE

Title or Position

Treasurer

Telephone number

217 - 787 - 7476

15020179275

Write or Type Committee Name

Friends of Dick Durbin Committee

## 6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Illinois Senate Victory

Mailing Address

120 Maryland Ave.

Washington

CITY

DC

STATE

20002

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☒ Joint Fundraising Representative ☐ Leadership PAC Sponsor

## 7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Anne Dougherty

Mailing Address

1408 Dial Ct.

Springfield

CITY

IL

STATE

62705

ZIP CODE

Title or Position

Treasurer

Telephone number

217 - 787 - 7476

## 8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name  
of Treasurer

Anne Dougherty

Mailing Address

1408 Dial Ct.

Springfield

CITY

IL

STATE

62704

ZIP CODE

Title or Position

Treasurer

Telephone number

217 - 787 - 7476



Full Name of  
Designated  
Agent

Mailing Address

Title or Position

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Chase Bank

Mailing Address

6th and Washington

Springfield

IL

62701

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Bank of America

Mailing Address

730 15th St. NW

Washington

DC

20005

CITY

STATE

ZIP CODE

15020179277

Full Name of  
Designated  
Agent

Mailing Address

Title or Position

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Amalgamated Bank

Mailing Address

1825 K St. NW

Washington

DC

20006

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

15020179278



# SUMMARY PAGE

FEC Form 3 (Revised 02/2003)

of Receipts and Disbursements

PAGE 2 / 46

Write or Type Committee Name

Friends of Dick Durbin Committee

Report Covering the Period:

From:

MM / DD / YYYY  
11 / 25 / 2014

To:

MM / DD / YYYY  
12 / 31 / 2014

COLUMN A  
This Period

COLUMN B  
Election Cycle-to-Date

## 6. Net Contributions (other than loans)

(a) Total Contributions  
(other than loans) (from Line 11(e)) ..

3301.17

4561.17

(b) Total Contribution Refunds  
(from Line 20(d)) ..

3541.66

3541.66

(c) Net Contributions (other than loans)  
(subtract Line 6(b) from Line 6(a))...

-240.49

1019.51

## 7. Net Operating Expenditures

(a) Total Operating Expenditures  
(from Line 17) ..

156731.49

205209.28

(b) Total Offsets to Operating  
Expenditures (from Line 14)...

6850.00

6850.00

(c) Net Operating Expenditures  
(subtract Line 7(b) from Line 7(a))...

149881.49

198359.28

## 8. Cash on Hand at Close of Reporting Period (from Line 27)...

741450.19

## 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

# **DETAILED SUMMARY PAGE** of Receipts

FEC Form 3 (Revised 12/2003)

PAGE 3 / 46

Write or Type Committee Name

Friends of Dick Durbin Committee

Report Covering the Period:

From:

MM / DD / YYYY  
11 / 25 / 2014

MM / DD / YYYY  
11 / 25 / 2014

MM / DD / YYYY  
11 / 25 / 2014

To:

MM / DD / YYYY  
12 / 31 / 2014

MM / DD / YYYY  
12 / 31 / 2014

MM / DD / YYYY  
12 / 31 / 2014

## **I. RECEIPTS**

**COLUMN A**  
Total This Period

**COLUMN B**  
Election Cycle-to-Date

### **11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A)...

1500.00

2050.00

(ii) Unitemized.....

801.17

1511.17

(iii) TOTAL of contributions from individuals

2301.17

3561.17

(b) Political Party Committees...

0.00

0.00

(c) Other Political Committees (such as PACs)...

1000.00

1000.00

(d) The Candidate.....

0.00

0.00

(e) TOTAL CONTRIBUTIONS

(other than loans)

(add Lines 11(a)(iii), (b), (c), and (d))..

3301.17

4561.17

### **12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES ..**

0.00

0.00

### **13. LOANS:**

(a) Made or Guaranteed by the Candidate...

0.00

0.00

(b) All Other Loans...

0.00

0.00

(c) TOTAL LOANS

(add Lines 13(a) and (b))...

0.00

0.00

### **14. OFFSETS TO OPERATING EXPENDITURES**

(Refunds, Rebates, etc.) ..

6850.00

6850.00

### **15. OTHER RECEIPTS**

(Dividends, Interest, etc.).....

9.25

9.25

### **16. TOTAL RECEIPTS (add Lines**

11(e), 12, 13(c), 14, and 15)

(Carry Total to Line 24, page 4)...

10160.42

11420.42

15020104847

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 4 / 46

## **II. DISBURSEMENTS**

**COLUMN A**  
Total This Period

**COLUMN B**  
Election Cycle-to-Date

17. OPERATING EXPENDITURES...

156731.49

205209.28

18. TRANSFERS TO OTHER  
AUTHORIZED COMMITTEES ..

0.00

0.00

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed  
by the Candidate...

0.00

0.00

(b) Of All Other Loans .....

0.00

0.00

(c) TOTAL LOAN REPAYMENTS  
(add Lines 19(a) and (b))...

0.00

0.00

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other  
Than Political Committees ...

3541.66

3541.66

(b) Political Party Committees...

0.00

0.00

(c) Other Political Committees  
(such as PACs) ...

0.00

0.00

(d) TOTAL CONTRIBUTION REFUNDS  
(add Lines 20(a), (b), and (c))...

3541.66

3541.66

21. OTHER DISBURSEMENTS ...

0.00

45000.00

22. TOTAL DISBURSEMENTS

(add Lines 17, 18, 19(c), 20(d), and 21) ►

160273.15

253750.94

## **III. CASH SUMMARY**

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD...

891562.92

24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3)...

10160.42

25. SUBTOTAL (add Line 23 and Line 24)...

901723.34

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)...

160273.15

27. CASH ON HAND AT CLOSE OF REPORTING PERIOD  
(subtract Line 26 from Line 25)...

741450.19

JULIE ADAMS  
SECRETARY

DANA E. MACCALLUM  
SUPERINTENDENT

HART SENATE OFFICE BUILDING  
SUITE 232

# United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

WASHINGTON, DC 20510-7116

PHONE (202) 224-6322

THE PRECEDING DOCUMENT WAS:

HAND DELIVERED

Date of Receipt

2/13/15

USPS FIRST CLASS MAIL

Postmark

USPS REGISTERED/CERTIFIED

Postmark

USPS PRIORITY MAIL

Postmark

DELIVERY CONFIRMATION OR SIGNATURE CONFIRMATION LABEL

☐

USPS EXPRESS MAIL

Postmark

## OVERNIGHT DELIVERY SERVICE:

SHIPPING DATE

NEXT BUSINESS DAY DELIVERY

FEDERAL EXPRESS

☐

UPS

☐

DHL

☐

AIRBORNE EXPRESS

☐

RECEIVED FROM FEDERAL ELECTION COMMISSION

Date of Receipt

POSTMARK ILLEGIBLE

☐

POSTMARK

☐

FAX

Date of Receipt

OTHER

Date of Receipt or Postmark

PREPARER

DATE PREPARED

MN 2/13/15

15020104892

FEC  
FORM 3REPORT OF RECEIPTS  
AND DISBURSEMENTS

For An Authorized Committee

SECRETARY OF THE SENATE

15 FEB 27 PM 3:57

Office Use Only

1. NAME OF  
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FE4M5

Friends of Dick Durbin Committee

ADDRESS (number and street)

P.O. Box 1949

Check if different  
than previously  
reported. (ACC)

Springfield

IL

62705

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

C

C00148999

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)

IL

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:



April 15 Quarterly Report (Q1)



July 15 Quarterly Report (Q2)



October 15 Quarterly Report (Q3)



January 31 Year-End Report (YE)



Termination Report (TER)

(b) 12-Day PRE-Election Report for the:



Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

M M / D D / Y Y Y Y

M M / D D / Y Y Y Y

M M / D D / Y Y Y Y

in the  
State of

M M / D D / Y Y Y Y

(c) 30-Day POST-Election Report for the:



General (30G)



Runoff (30R)



Special (30S)

Election on

M M / D D / Y Y Y Y

M M / D D / Y Y Y Y

M M / D D / Y Y Y Y

in the  
State of

M M / D D / Y Y Y Y

5. Covering Period

M M / D D / Y Y Y Y  
11 / 25 / 2014M M / D D / Y Y Y Y  
11 / 25 / 2014M M / D D / Y Y Y Y  
11 / 25 / 2014

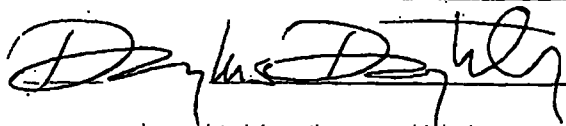
through

M M / D D / Y Y Y Y  
12 / 31 / 2014M M / D D / Y Y Y Y  
12 / 31 / 2014M M / D D / Y Y Y Y  
12 / 31 / 2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Douglas Dougherty

Signature of Treasurer



Date

M M / D D / Y Y Y Y  
01 / 23 / 2015M M / D D / Y Y Y Y  
01 / 23 / 2015M M / D D / Y Y Y Y  
01 / 23 / 2015

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
OnlyFEC FORM 3  
(Revised 02/2003)



# SUMMARY PAGE

of Receipts and Disbursements

Write or Type Committee Name

Friends of Dick Durbin Committee

Report Covering the Period:

From:

M	M	M	D	D	D	Y	Y	Y	Y	Y	Y
1	1	1	2	5		2	0	1	4		

To:

M	M	M	D	D	D	Y	Y	Y	Y	Y	Y
1	2		3	1		2	0	1	4		

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e)) ..	3301.17	4561.17
(b) Total Contribution Refunds (from Line 20(d)) ..	3541.66	3541.66
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))...	-240.49	1019.51
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17) ..	156731.49	205209.28
(b) Total Offsets to Operating Expenditures (from Line 14)...	6850.00	6850.00
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))...	149881.49	198359.28
8. Cash on Hand at Close of Reporting Period (from Line 27)...	741450.19	
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

**DETAILED SUMMARY PAGE**  
of Receipts

FEC Form 3 (Revised 12/2003)

PAGE 3 / 46

Write or Type Committee Name

Friends of Dick Durbin Committee

Report Covering the Period:

From:

MM / DD / YYYY  
11 / 25 / 2014

To:

MM / DD / YYYY  
12 / 31 / 2014

**I. RECEIPTS**

**COLUMN A**  
Total This Period

**COLUMN B**  
Election Cycle-to-Date

**11. CONTRIBUTIONS (other than loans) FROM:**

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A)...

(ii) Unitemized.....

(iii) TOTAL of contributions from individuals

(b) Political Party Committees...

(c) Other Political Committees (such as PACs)...

(d) The Candidate.....

(e) TOTAL CONTRIBUTIONS

(other than loans)

(add Lines 11(a)(iii), (b), (c), and (d))..

**12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES ..**

**13. LOANS:**

(a) Made or Guaranteed by the Candidate...

(b) All Other Loans...

(c) TOTAL LOANS

(add Lines 13(a) and (b))...

**14. OFFSETS TO OPERATING EXPENDITURES**

(Refunds, Rebates, etc.) ..

**15. OTHER RECEIPTS**

(Dividends, Interest, etc.).....

**16. TOTAL RECEIPTS (add Lines**

11(a), 12, 13(c), 14, and 15)

(Carry Total to Line 24, page 4)...

1500.00	2050.00
801.17	1511.17
2301.17	3561.17
0.00	0.00
1000.00	1000.00
0.00	0.00
3301.17	4561.17
0.00	0.00
0.00	0.00
0.00	0.00
0.00	0.00
6850.00	6850.00
9.25	9.25
10160.42	11420.42

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 4 / 46

## **II. DISBURSEMENTS**

**COLUMN A**  
Total This Period

**COLUMN B**  
Election Cycle-to-Date

17. OPERATING EXPENDITURES...

156731.49

205209.28

18. TRANSFERS TO OTHER  
AUTHORIZED COMMITTEES ..

0.00

0.00

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed  
by the Candidate...

0.00

0.00

(b) Of All Other Loans .....

0.00

0.00

(c) TOTAL LOAN REPAYMENTS  
(add Lines 19(a) and (b))...

0.00

0.00

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other  
Than Political Committees...

3541.66

3541.66

(b) Political Party Committees...

0.00

0.00

(c) Other Political Committees  
(such as PACs) ..

0.00

0.00

(d) TOTAL CONTRIBUTION REFUNDS  
(add Lines 20(a), (b), and (c))...

3541.66

3541.66

21. OTHER DISBURSEMENTS ..

0.00

45000.00

22. TOTAL DISBURSEMENTS

(add Lines 17, 18, 19(c), 20(d), and 21) ▶

160273.15

253750.94

## **III. CASH SUMMARY**

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD...

891562.92

24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3)...

10160.42

25. SUBTOTAL (add Line 23 and Line 24)...

901723.34

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)...

160273.15

27. CASH ON HAND AT CLOSE OF REPORTING PERIOD  
(subtract Line 26 from Line 25)...

741450.19

JULIE ADAMS  
SECRETARY

DANA E. MACCALLUM  
SUPERINTENDENT

HART SENATE OFFICE BUILDING  
SUITE 232

WASHINGTON, DC 20510-7116

PHONE(202) 224-0322

# United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT WAS:

HAND DELIVERED \_\_\_\_\_  
Date of Receipt

USPS FIRST CLASS MAIL \_\_\_\_\_  
Postmark

USPS REGISTERED/CERTIFIED 2-23-15  
Postmark

USPS PRIORITY MAIL \_\_\_\_\_  
Postmark

DELIVERY CONFIRMATION OR SIGNATURE CONFIRMATION LABEL ☐

USPS EXPRESS MAIL \_\_\_\_\_  
Postmark

## OVERNIGHT DELIVERY SERVICE:

SHIPPING DATE NEXT BUSINESS DAY DELIVERY

FEDERAL EXPRESS	_____	<input type="checkbox"/>
UPS	_____	<input type="checkbox"/>
DHL	_____	<input type="checkbox"/>
AIRBORNE EXPRESS	_____	<input type="checkbox"/>

RECEIVED FROM FEDERAL ELECTION COMMISSION \_\_\_\_\_  
Date of Receipt

POSTMARK ILLEGIBLE ☐ POSTMARK: ☐

FAX \_\_\_\_\_  
Date of Receipt

OTHER \_\_\_\_\_  
Date of Receipt or Postmark

PREPARER DH DATE PREPARED 2-27-15

15020108753



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 7, 2015

Anne Dougherty, Treasurer  
Friends of Dick Durbin  
P.O. Box 1949  
Springfield, IL 62705

C00148999  
AF#: 2970

Dear Mrs. Dougherty:

On April 3, 2015, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Friends of Dick Durbin and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to file the 2014 Year-End Report. The Commission also made a preliminary determination that the civil money penalty was \$2,930 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission take no further action and close the file. 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  
Reviewing Officer  
Office of Administrative Review



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2015 AUG 25 PM 2: 04

August 25, 2015

MEMORANDUM

**SENSITIVE**

To: The Commission

Through: Alec Palmer *AP*  
Staff Director

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

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2970 – Friends of Dick Durbin and Anne Dougherty, in her official capacity as Treasurer (C00148999)

On April 3, 2015, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2014 Year-End Report and made a preliminary determination that the civil money penalty was \$2,930 based on the schedule of penalties at 11 C.F.R. § 111.43.

On June 9, 2015, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated August 7, 2015 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. Given the Commission's record was incomplete, and the 2014 Year-End Report was mailed timely via USPS Certified Mail, a “safe harbor” delivery method outlined in 52 U.S.C. § 30104(a)(5), the Commission's RTB finding was based on a factual error. 11 C.F.R. § 111.35(b)(1). Therefore, the Reviewing Officer recommended that the Commission take no further action and close the file.

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). As of this date, a written response has not been received.

### **OAR Recommendations**

- 1) Take no further action in AF# 2970 that Friends of Dick Durbin and Anne Dougherty, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file; and
- 2) Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Final Determination Recommendation: ) AF 2970  
Friends of Dick Durbin and Anne )  
Dougherty, in her official capacity as )  
Treasurer (C00148999) )

CERTIFICATION


I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on September 03, 2015, the Commission decided by a vote of 6-0 to take the following actions in AF 2970:

1. Take no further action in AF# 2970 that Friends of Dick Durbin and Anne Dougherty, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file.
2. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

  
September 3, 2015  
Date

  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 4, 2015

Anne Dougherty, in official capacity as Treasurer  
Friends of Dick Durbin  
P.O. Box 1949  
Springfield, IL 62705

C00148999  
AF# 2970

Dear Ms. Dougherty:

On April 3, 2015, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Friends of Dick Durbin and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2014 Year-End Report. By letter dated April 6, 2015, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$2,930 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On June 9, 2015, 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 your written response. Based on this review, the Reviewing Officer recommended that the Commission take no further action because you timely filed the report. The Reviewing Officer Recommendation was sent to you on August 7, 2015.

On September 3, 2015, the Commission adopted the Reviewing Officer's recommendation to take no further action with respect to 52 U.S.C. § 30104(a) and close the file. A copy of the Final Determination Recommendation is attached.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding this matter, 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,

A handwritten signature in cursive script, reading "Ann M. Ravel".

Ann M. Ravel  
Chair



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2970

DATE SCANNED 9/23/15

SCANNER NO. 2

SCAN OPERATOR JB/af