

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #3530



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2018 DEC -3 AM 10: 28

**SENSITIVE**

December 3, 2018

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP w/ JHAK*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *KDR BH*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Withdrawal and Resubmission of Reason To Believe Recommendation – 2018  
October Quarterly Report (Non-Election Sensitive) for the Administrative  
Fine Program

We are withdrawing the document circulated to the Commission on November 29, 2018 in order to remove two committees that filed a report which would exclude them from the administrative fine program for the 2018 October Quarterly Report. The report was received by the Commission after the RTB Recommendation was circulated, but before the vote due date.

Attached is a list of political committees and their treasurers who failed to file the 2018 October Quarterly Report (Non-Election Sensitive) in accordance with 52 U.S.C. § 30104(a). The October Quarterly Report was due on October 15, 2018.

The committees listed on the attached RTB Circulation Report either failed to file the report, filed 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, in their official capacity, 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.

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Federal Election Commission  
Reason to Believe Circulation Report  
2018 OCTOBER QUARTERLY Not Election Sensitive 10/15/2018 H\_S\_P\_UNAUTH

| AF#  | Committee ID | Committee Name                            | Candidate Name         | Treasurer              | Threshold   | PV | Receipt Date | Days Late   | LOA             | RTB Penalty |
|------|--------------|---|------------------------|------------------------|-------------|----|--------------|-------------|-----------------|-------------|
| 3507 | C00612796    | ADAM BELL POLITICAL CAMPAIGN              | ADAM BELL              | LOUIS WILLIAM ZONA JR. | \$416,473   | 0  |              | Not Filed   | \$59,496 (est)  | \$3,828     |
| 3508 | C00664763    | ANGIE CHIRINO FOR CONGRESS                | ANGIE CHIRINO          | JORGE MIRABENT         | \$111,420   | 0  |              | Not Filed   | \$55,710 (est)  | \$3,828     |
| 3509 | C00670414    | BILL HOPKINS FOR CONGRESS                 | WILLIAM E. HOPKINS JR. | WILLIAM E. HOPKINS JR. | \$224,782   | 0  |              | Not Filed   | \$74,927 (est)  | \$3,828     |
| 3510 | C00636175    | BILLY KOVACS FOR CONGRESS                 | WILLIAM RICHARD KOVACS | BILLY KOVACS           | \$144,244   | 0  |              | Not Filed   | \$20,606 (est)  | \$667       |
| 3512 | C00663104    | COMMITTEE TO ELECT HP                     | HAMID PARVIZIAN        | DOUNIA METOURI         | \$213,822   | 0  |              | Not Filed   | \$106,911 (est) | \$6,380     |
| 3513 | C00638767    | CORI BUSH 2018                            | CORI BUSH              | CORI BUSH              | \$239,109   | 0  |              | Not Filed   | \$39,852 (est)  | \$1,200     |
| 3514 | C00657445    | DAS FOR CONGRESS                          | ABHIJIT BEEJ DAS       | SEAN SMITH             | \$1,268,044 | 0  |              | Not Filed*  | \$230,664*      | \$9,214     |
| 3515 | C00630798    | DOROTHY GASQUE FOR CONGRESS               | DOROTHY GASQUE         | MEGAN JONES            | \$134,065   | 0  |              | Not Filed   | \$19,152 (est)  | \$667       |
| 3516 | C00661900    | DOUG MCLINKO FOR CONGRESS                 | DOUG MCLINKO           | HELEN SANTIAGO         | \$216,980   | 0  |              | Not Filed   | \$54,245 (est)  | \$3,828     |
| 3517 | C00634543    | DR KATHIE ALLEN FOR CONGRESS              | KATHRYN ALLEN          | KATHRYN ALLEN          | \$1,738,475 | 0  | 11/16/2018   | Not Filed** | \$1,766         | \$333       |
| 3518 | C00650929    | ETHAN PHAM FOR CONGRESS                   | ETHAN PHAM             | JENNY NGUYEN           | \$899,086   | 0  |              | Not Filed   | \$179,817 (est) | \$7,797     |
| 3519 | C00668137    | FRIENDS OF BRENDA JONES                   | BRENDA JONES           | STEPHEN GRADY          | \$522,031   | 0  | 10/25/2018   | 10          | \$184,605       | \$3,255     |
| 3520 | C00641175    | FRIENDS OF EDDIE SUNDQUIST                | EDWARD A. SUNDQUIST    | ELLIOT S. RAIMONDO     | \$238,706   | 0  |              | Not Filed   | \$39,784 (est)  | \$1,200     |
| 3521 | C00630434    | FRIENDS OF EDWIN SANTANA JR. FOR CONGRESS | EDWIN SANTANA JR.      | TRACY LEE SANTANA      | \$117,759   | 0  |              | Not Filed   | \$19,627 (est)  | \$667       |
| 3522 | C00661066    | FRIENDS OF RAY LINSENMAYER                | RAYMOND LINSENMAYER    | DAVID HAMBURGER        | \$115,969   | 0  |              | Not Filed   | \$38,656 (est)  | \$1,200     |
| 3524 | C00649285    | GOLDEN FOR CONGRESS                       | IAN GOLDEN             | IAN GOLDEN             | \$208,901   | 0  |              | Not Filed   | \$41,780 (est)  | \$1,200     |
| 3525 | C00664086    | HART 2020                                 | HART P. CUNNINGHAM     | HART C. CUNNINGHAM     | \$677,345   | 0  |              | Not Filed   | \$225,782 (est) | \$9,214     |
| 3526 | C00641035    | JEFF BEALS FOR CONGRESS                   | JEFFREY BEALS          | ALLEN BEALS            | \$715,694   | 0  |              | Not Filed   | \$119,282 (est) | \$6,380     |
| 3527 | C00672899    | JOSH KIMBRELL FOR CONGRESS                | JOSHUA BRETT KIMBRELL  | FRANK ROGERS           | \$764,307   | 0  |              | Not Filed   | \$254,769 (est) | \$11,341    |
| 3528 | C00661173    | L'ITALIEN FOR CONGRESS                    | BARBARA L'ITALIEN      | ANNETTE GRAMS          | \$1,683,650 | 0  | 10/26/2018   | 11          | \$250,972       | \$5,240     |
| 3529 | C00674325    | LIBERATORE FOR CONGRESS-2018              | PHIL LIBERATORE        | LOUIS BAGLIETTO JR.    | \$475,899   | 0  |              | Not Filed   | \$158,633 (est) | \$7,797     |
| 3530 | C00660126    | MARK MACKENZIE FOR CONGRESS               | MARK S. MACKENZIE      | RONALD P. GEOFFROY     | \$602,493   | 0  | 11/5/2018    | 21          | \$18,114        | \$268       |

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| AF#  | Committee ID | Committee Name                  | Candidate Name    | Treasurer         | Threshold | PV | Receipt Date | Days Late   | LOA             | RTB Penalty |
|------|--------------|---------------------------------|-------------------|-------------------|-----------|----|--------------|-------------|-----------------|-------------|
| 3531 | C00664516    | MARTY GEARHEART FOR CONGRESS    | MARTY GEARHEART   | NISHANT GROVER    | \$182,662 | 0  |              | Not Filed   | \$60,887 (est)  | \$3,828     |
| 3532 | C00668129    | MORGAN DUNN FOR CONGRESS        | MORGAN DUNN       | CHRIS DUNN        | \$248,012 | 0  | 10/22/2018   | 7           | \$25,196        | \$472       |
| 3533 | C00634873    | NEILL FOR ILLINOIS              | NEILL MOHAMMAD    | ANDREW NALL       | \$426,285 | 0  | 10/29/2018   | 14          | \$4,776         | \$118       |
| 3534 | C00647313    | OMAR VAID FOR CONGRESS          | OMAR M. VAID      | OMAR VAID         | \$394,840 | 0  |              | Not Filed   | \$65,807 (est)  | \$3,828     |
| 3536 | C00647560    | REUBEN FOR CONGRESS             | REUBEN D'SILVA    | BREON KING        | \$155,773 | 0  |              | Not Filed   | \$38,943 (est)  | \$1,200     |
| 3537 | C00661256    | ROEL GARCIA FOR CONGRESS        | ROEL GARCIA       | ROCIO GARCIA      | \$102,778 | 0  |              | Not Filed   | \$25,695 (est)  | \$1,200     |
| 3538 | C00640755    | ROZA CALDERON FOR CONGRESS 2018 | ROZA I. CALDERON  | MICHAEL WILLIAMS  | \$129,499 | 1  |              | Not Filed   | \$32,375 (est)  | \$1,500     |
| 3539 | C00662130    | SOL FLORES FOR CONGRESS         | SOL FLORES        | JENNIFER MAY      | \$657,974 | 0  |              | Not Filed   | \$164,494 (est) | \$7,797     |
| 3540 | C00652388    | SULLIVAN FOR CONGRESS           | JOE SULLIVAN      | JOE SMENTEK       | \$488,841 | 0  | 11/26/2018   | Not Filed** | \$27,269        | \$1,200     |
| 3542 | C00649368    | TIM RICH FOR CONGRESS           | TIMOTHY A. RICH   | TIMOTHY A. RICH   | \$136,614 | 0  |              | Not Filed   | \$45,538 (est)  | \$1,200     |
| 3543 | C00629881    | TO ELECT JENNY MARSHALL         | JENNIFER MARSHALL | MONICA A. VALLIER | \$234,551 | 0  |              | Not Filed   | \$39,092 (est)  | \$1,200     |
| 3544 | C00614305    | VOLUNTEERS FOR NEHLEN           | PAUL NEHLEN       | PAUL NEHLEN       | \$405,238 | 0  |              | Not Filed   | \$57,891 (est)  | \$3,828     |
| 3545 | C00658450    | VOTE SANGARI                    | SARGIS SANGARI    | JOSEPH TAMRAZ     | \$137,316 | 0  |              | Not Filed   | \$45,772 (est)  | \$1,200     |
| 3546 | C00662338    | ZACH SCOTT FOR CONGRESS         | ZACH SCOTT        | JULIE KEMP        | \$111,848 | 0  |              | Not Filed   | \$27,962 (est)  | \$1,200     |

\* Per CFR § 104.18, this committee is required to file electronic reports. The committee filed the 2018 October Quarterly Report on paper; therefore, the report is considered not filed. Although not considered an acceptable filing, the financial activity on the paper report was used to calculate the committee's level of activity for the reporting period.

\*\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

## BEFORE THE FEDERAL ELECTION COMMISSION

|  |   |          |
|--|---|----------|
| In the Matter of                       | ) |          |
|  | ) |          |
| Withdrawal and Resubmission of Reason  | ) |          |
| To Believe Recommendation - 2018       | ) |          |
| October Quarterly Report (Non-Election | ) |          |
| Sensitive) for the Administrative Fine | ) |          |
| Program:                               | ) |          |
| ADAM BELL POLITICAL CAMPAIGN,          | ) | AF# 3507 |
| and ZONA, LOUIS WILIAM JR. as          | ) |          |
| treasurer;                             | ) |          |
| ANGIE CHIRINO FOR CONGRESS, and        | ) | AF# 3508 |
| MIRABENT, JORGE MR. as treasurer;      | ) |          |
| BILL HOPKINS FOR CONGRESS, and         | ) | AF# 3509 |
| HOPKINS, WILLIAM E. JR. as treasurer;  | ) |          |
| BILLY KOVACS FOR CONGRESS, and         | ) | AF# 3510 |
| KOVACS, BILLY as treasurer;            | ) |          |
| COMMITTEE TO ELECT HP, and             | ) | AF# 3512 |
| METOURI, DOUNIA as treasurer;          | ) |          |
| CORI BUSH 2018, and BUSH, CORI as      | ) | AF# 3513 |
| treasurer;                             | ) |          |
| DAS FOR CONGRESS, and SMITH,           | ) | AF# 3514 |
| SEAN as treasurer;                     | ) |          |
| DOROTHY GASQUE FOR CONGRESS,           | ) | AF# 3515 |
| and JONES, MEGAN as treasurer;         | ) |          |
| DOUG MCLINKO FOR CONGRESS, and         | ) | AF# 3516 |
| SANTIAGO, HELEN as treasurer;          | ) |          |
| DR KATHIE ALLEN FOR CONGRESS,          | ) | AF# 3517 |
| and ALLEN, KATHRYN DR. as treasurer;   | ) |          |
| ETHAN PHAM FOR CONGRESS, and           | ) | AF# 3518 |
| NGUYEN, JENNY as treasurer;            | ) |          |
| FRIENDS OF BRENDA JONES, and           | ) | AF# 3519 |
| GRADY, STEPHEN as treasurer;           | ) |          |
| FRIENDS OF EDDIE SUNDQUIST, and        | ) | AF# 3520 |
| RAIMONDO, ELLIOT S. as treasurer;      | ) |          |
| FRIENDS OF EDWIN SANTANA JR.           | ) | AF# 3521 |
| FOR CONGRESS, and SANTANA,             | ) |          |
| TRACY LEE as treasurer;                | ) |          |

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|   |          |
|---|----------|
| FRIENDS OF RAY LINSENMAYER, and<br>HAMBURGER, DAVID as treasurer; | AF# 3522 |
| GOLDEN FOR CONGRESS, and )  | AF# 3524 |
| GOLDEN, IAN as treasurer; )                                       |          |
| HART 2020, and CUNNINGHAM, HART )                                 | AF# 3525 |
| C. as treasurer; )  |          |
| JEFF BEALS FOR CONGRESS, and )                                    | AF# 3526 |
| BEALS, ALLEN as treasurer; )                                      |          |
| JOSH KIMBRELL FOR CONGRESS, and )                                 | AF# 3527 |
| ROGERS, FRANK as treasurer; )                                     |          |
| L'ITALIEN FOR CONGRESS, and )                                     | AF# 3528 |
| GRAMS, ANNETTE as treasurer; )                                    |          |
| LIBERATORE FOR CONGRESS-2018, )                                   | AF# 3529 |
| and BAGLIETTO, LOUIS JR as treasurer; )                           |          |
| MARK MACKENZIE FOR CONGRESS, )                                    | AF# 3530 |
| and GEOFFROY, RONALD P as treasurer; )                            |          |
| MARTY GEARHEART FOR CONGRESS, )                                   | AF# 3531 |
| and GROVER, NISHANT as treasurer; )                               |          |
| MORGAN DUNN FOR CONGRESS, and )                                   | AF# 3532 |
| DUNN, CHRIS as treasurer; )                                       |          |
| NEILL FOR ILLINOIS, and NALL, )                                   | AF# 3533 |
| ANDREW as treasurer; )  |          |
| OMAR VAID FOR CONGRESS, and )                                     | AF# 3534 |
| VAID, OMAR as treasurer; )  |          |
| REUBEN FOR CONGRESS, and KING, )                                  | AF# 3536 |
| BREON as treasurer; )   |          |
| ROEL GARCIA FOR CONGRESS, and )                                   | AF# 3537 |
| GARCIA, ROCIO as treasurer; )                                     |          |
| ROZA CALDERON FOR CONGRESS )                                      | AF# 3538 |
| 2018, and WILIAMS, MICHAEL as )                                   |          |
| treasurer; )  |          |
| SOL FLORES FOR CONGRESS, and )                                    | AF# 3539 |
| MAY, JENNIFER as treasurer; )                                     |          |
| SULLIVAN FOR CONGRESS, and )                                      | AF# 3540 |
| SMENTEK, JOE as treasurer; )                                      |          |
| TIM RICH FOR CONGRESS, and RICH, )                                | AF# 3542 |
| TIMOTHY A as treasurer; )   |          |
| TO ELECT JENNY MARSHALL, and )                                    | AF# 3543 |
| VALLIER, MONICA A as treasurer; )                                 |          |
| VOLUNTEERS FOR NEHLEN, and )                                      | AF# 3544 |
| NEHLEN, PAUL as treasurer; )                                      |          |
| VOTE SANGARI, and TAMRAZ, JOSEPH )                                | AF# 3545 |
| MR. as treasurer; )   |          |
| ZACH SCOTT FOR CONGRESS, and )                                    | AF# 3546 |
| KEMP, JULIE as treasurer; )                                       |          |

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 04, 2018 the Commission took the following actions on the Withdrawal and Resubmission of Reason To Believe Recommendation - 2018 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated December 03, 2018, on the following committees:

AF#3507 Decided by a vote of 4-0 to: (1) find reason to believe that ADAM BELL POLITICAL CAMPAIGN, and ZONA, LOUIS WILLIAM JR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3508 Decided by a vote of 4-0 to: (1) find reason to believe that ANGIE CHIRINO FOR CONGRESS, and MIRABENT, JORGE MR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3509 Decided by a vote of 4-0 to: (1) find reason to believe that BILL HOPKINS FOR CONGRESS, and HOPKINS, WILLIAM E. JR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3510 Decided by a vote of 4-0 to: (1) find reason to believe that BILLY KOVACS FOR CONGRESS, and KOVACS, BILLY in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter.

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

AF#3512 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT HP, and METOURI, DOUNIA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3513 Decided by a vote of 4-0 to: (1) find reason to believe that CORI BUSH 2018, and BUSH, CORI in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3514 Decided by a vote of 4-0 to: (1) find reason to believe that DAS FOR CONGRESS, and SMITH, SEAN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3515 Decided by a vote of 4-0 to: (1) find reason to believe that DOROTHY GASQUE FOR CONGRESS, and JONES, MEGAN in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3516 Decided by a vote of 4-0 to: (1) find reason to believe that DOUG MCLINKO FOR CONGRESS, and SANTIAGO, HELEN in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3517 Decided by a vote of 4-0 to: (1) find reason to believe that DR KATHIE ALLEN FOR CONGRESS, and ALLEN, KATHRYN DR. in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3518 Decided by a vote of 4-0 to: (1) find reason to believe that ETHAN PHAM FOR CONGRESS, and NGUYEN, JENNY in her official capacity as treasurer

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violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3519 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF BRENDA JONES, and GRADY, STEPHEN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3520 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF EDDIE SUNDQUIST, and RAIMONDO, ELLIOT S. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3521 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF EDWIN SANTANA JR. FOR CONGRESS, and SANTANA, TRACY LEE in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3522 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF RAY LINSENMAYER, and HAMBURGER, DAVID in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3524 Decided by a vote of 4-0 to: (1) find reason to believe that GOLDEN FOR CONGRESS, and GOLDEN, IAN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3525 Decided by a vote of 4-0 to: (1) find reason to believe that HART 2020, and CUNNINGHAM, HART C. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#3526 Decided by a vote of 4-0 to: (1) find reason to believe that JEFF BEALS FOR CONGRESS, and BEALS, ALLEN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3527 Decided by a vote of 4-0 to: (1) find reason to believe that JOSH KIMBRELL FOR CONGRESS, and ROGERS, FRANK in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3528 Decided by a vote of 4-0 to: (1) find reason to believe that L'ITALIEN FOR CONGRESS, and GRAMS, ANNETTE in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3529 Decided by a vote of 4-0 to: (1) find reason to believe that LIBERATORE FOR CONGRESS-2018, and BAGLIETTO, LOUIS JR in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3530 Decided by a vote of 4-0 to: (1) find reason to believe that MARK MACKENZIE FOR CONGRESS, and GEOFFROY, RONALD P in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3531 Decided by a vote of 4-0 to: (1) find reason to believe that MARTY GEARHEART FOR CONGRESS, and GROVER, NISHANT in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3532 Decided by a vote of 4-0 to: (1) find reason to believe that MORGAN DUNN FOR CONGRESS, and DUNN, CHRIS in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money

penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3533 Decided by a vote of 4-0 to: (1) find reason to believe that NEILL FOR ILLINOIS, and NALL, ANDREW in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3534 Decided by a vote of 4-0 to: (1) find reason to believe that OMAR VAID FOR CONGRESS, and VAID, OMAR in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3536 Decided by a vote of 4-0 to: (1) find reason to believe that REUBEN FOR CONGRESS, and KING, BREON in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3537 Decided by a vote of 4-0 to: (1) find reason to believe that ROEL GARCIA FOR CONGRESS, and GARCIA, ROCIO in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3538 Decided by a vote of 4-0 to: (1) find reason to believe that ROZA CALDERON FOR CONGRESS 2018, and WILIAMS, MICHAEL in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3539 Decided by a vote of 4-0 to: (1) find reason to believe that SOL FLORES FOR CONGRESS, and MAY, JENNIFER in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission  
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AF#3540 Decided by a vote of 4-0 to: (1) find reason to believe that SULLIVAN FOR CONGRESS, and SMENTEK, JOE in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3542 Decided by a vote of 4-0 to: (1) find reason to believe that TIM RICH FOR CONGRESS, and RICH, TIMOTHY A in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3543 Decided by a vote of 4-0 to: (1) find reason to believe that TO ELECT JENNY MARSHALL, and VALLIER, MONICA A in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3544 Decided by a vote of 4-0 to: (1) find reason to believe that VOLUNTEERS FOR NEHLEN, and NEHLEN, PAUL in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3545 Decided by a vote of 4-0 to: (1) find reason to believe that VOTE SANGARI, and TAMRAZ, JOSEPH MR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#3546 Decided by a vote of 4-0 to: (1) find reason to believe that ZACH SCOTT FOR CONGRESS, and KEMP, JULIE in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

December 6, 2018  
Date

Dayna C. Brown  
Dayna C. Brown  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 6, 2018

Ronald P. Geoffroy, in official capacity as Treasurer  
Mark MacKenzie for Congress  
319 West Erie Street  
Manchester, NH 03102

C00660126  
AF#: 3530

Dear Mr. Geoffroy:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an October Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period August 23, 2018 through September 30, 2018, shall be filed no later than October 15, 2018. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on November 5, 2018, 21 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. § 30109g(a)(4). On December 4, 2018, the FEC found that there is reason to believe ("RTB") that Mark MacKenzie for Congress 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 October 15, 2018. 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 \$268. 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 \$268 is due within forty (40) days of the finding, or by January 13, 2019, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$18,114  
Number of Days Late: 21  
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, 1050 First

Street, NE, Washington, DC 20002. 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 January 13, 2019. 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 Mark MacKenzie for Congress 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, follow the payment instructions on page 4 of this letter. 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 Aimee Wechsler 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,



Caroline C. Hunter  
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 \$268 for the 2018 October Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](http://www.fec.gov/af/pay.shtml) to be directed to Pay.gov's Administrative Fine Program Payment form.

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

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

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

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

**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: Mark MacKenzie for Congress

FEC ID#: C00660126

AF#: 3530

PAYMENT DUE DATE: January 13, 2019

PAYMENT AMOUNT DUE: \$268

**RECEIVED**

By Office of the Commission Secretary at 9:11 am, Jun 08, 2020



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

June 5, 2020

**MEMORANDUM**

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: <sup>*KDR*</sup> Kristin D. Roser/<sup>*BH*</sup> Ben Holly  
Reports Analysis Division  
Compliance Branch

SUBJECT: Withdrawal and Resubmission of Final Determination Recommendation – 2018 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on September 24, 2019 in order to reflect updates disclosed in filings received by the Commission after the initial submission of this recommendation. On November 30, 2019, Cori Bush for Congress (AF 3513) filed an Amended 2018 October Quarterly Report that disclosed a level of activity higher than that previously reported. On November 9, 2019, Hart 2020 (AF 3525) filed a Miscellaneous Text Submission that disclosed no activity for the 2018 October Quarterly reporting period. The circulation report has been updated to reflect the level of activity and final civil money penalty amounts disclosed on the most recent filings for both 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 2018 October Quarterly Report (Non-Election Sensitive). 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, sixteen (16) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Adam Bell Political Campaign (AF 3507) disclosed no activity after the RTB finding (previously estimated to be \$59,496), which would result in no civil money penalty (fine previously assessed to be \$3,828).

Angie Chirino for Congress (AF 3508) disclosed no activity after the RTB finding (previously estimated to be \$55,710), which would result in no civil money penalty (fine previously assessed to be \$3,828).

Bill Hopkins for Congress (AF 3509) filed a Termination Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$998 (previously estimated to be \$74,927), thus the fine would be lowered from \$3,828 to \$333.

Doug McLinko for Congress (AF 3516) filed the 2018 October Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$31 (previously estimated to be \$54,245), thus the fine would be lowered from \$3,828 to \$31.

Ethan Pham for Congress (AF 3518) disclosed no activity after the RTB finding (previously estimated to be \$179,817), which would result in no civil money penalty (fine previously assessed to be \$7,797).

Friends of Eddie Sundquist (AF 3520) filed the 2018 October Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$10,259 (previously estimated to be \$39,784), thus the fine would be lowered from \$1,200 to \$667.

Friends of Edwin Santana Jr. for Congress (AF 3521) filed the 2018 October Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$274 (previously estimated to be \$19,627), thus the fine would be lowered from \$667 to \$274.

Friends of Ray Linsenmayer (AF 3522) disclosed no activity after the RTB finding (previously estimated to be \$38,656), which would result in no civil money penalty (fine previously assessed to be \$1,200).

Hart 2020 (AF 3525) disclosed no activity after the RTB finding (previously estimated to be \$225,782), which would result in no civil money penalty (fine previously assessed to be \$9,214).

Josh Kimbrell for Congress (AF 3527) filed the 2018 October Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$2,744 (previously estimated to be \$254,769), thus the fine would be lowered from \$11,341 to \$333.

Liberatore for Congress-2018 (AF 3529) disclosed no activity after the RTB finding (previously estimated to be \$158,633), which would result in no civil money penalty (fine previously assessed to be \$7,797).

Omar Vaid for Congress (AF 3534) filed the 2018 October Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$23,524 (previously estimated to be \$65,807), thus the fine would be lowered from \$3,828 to \$667.

Roel Garcia for Congress (AF 3537) filed the 2018 October Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$113 (previously estimated to be \$25,695), thus the fine would be lowered from \$1,200 to \$113.

Sol Flores for Congress (AF 3539) filed the 2018 October Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$319 (previously estimated to be \$164,494), thus the fine would be lowered from \$7,797 to \$319.

Vote Sangari (AF 3545) disclosed no activity after the RTB finding (previously estimated to be \$45,772), which would result in no civil money penalty (fine previously assessed to be \$1,200).

Zach Scott for Congress (AF 3546) filed a Termination Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$3,774 (previously estimated to be \$27,962), thus the fine would be lowered from \$1,200 to \$333.

For your information, one (1) committee disclosed a change in treasurer after the RTB finding. An overview of this case has been provided below.

To Elect Jenny Marshall (AF 3543) filed an Amended Statement of Organization after the RTB finding designating Jennifer Marshall as Treasurer.

### **RAD Recommendation**

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.

- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (3) Send the appropriate letters.

Federal Election Commission  
 FD Circulation Report Fine Paid  
 2018 OCTOBER QUARTERLY Not Election Sensitive 10/15/2018 H\_S\_P\_UNAUTH

| 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 |
|------|------------------------------|-------------------|--------------|--------------------|--------------|------------|----------------|----|------------|-------------|---------------------|------------|-------------|
| 3517 | DR KATHIE ALLEN FOR CONGRESS | KATHRYN ALLEN     | C00634543    | KATHRYN ALLEN      | 11/16/2018   | Not Filed* | \$1,766        | 0  | 12/04/2018 | \$333       | \$333               | 3/20/2019  | \$1,033**   |
| 3530 | MARK MACKENZIE FOR CONGRESS  | MARK S. MACKENZIE | C00660126    | RONALD P. GEOFFROY | 11/05/2018   | 21         | \$18,114       | 0  | 12/04/2018 | \$268       | \$268               | 12/24/2018 | \$268       |
| 3536 | REUBEN FOR CONGRESS          | REUBEN D'SILVA    | C00647560    | BREON KING         |              | Not Filed  | \$38,943 (est) | 0  | 12/04/2018 | \$1,200     | \$1,200             | 1/17/2019  | \$1,200     |

\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

\*\* The committee overpaid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference.

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2018 OCTOBER QUARTERLY Not Election Sensitive 10/15/2018 H\_S\_P\_UNAUTH

| AF#  | Committee Name                            | Candidate Name         | Committee ID | Treasurer              | Receipt Date | Days Late  | LOA             | PV | RTB Date   | RTB Penalty | Days Since RTB | FD Penalty |
|------|---|------------------------|--------------|------------------------|--------------|------------|-----------------|----|------------|-------------|----------------|------------|
| 3507 | ADAM BELL POLITICAL CAMPAIGN              | ADAM BELL              | C00612796    | LOUIS WILIAM ZONA JR.  |              | Not Filed  | \$0             | 0  | 12/04/2018 | \$3,828     | 549            | NONE       |
| 3508 | ANGIE CHIRINO FOR CONGRESS                | ANGIE CHIRINO          | C00664763    | JORGE MIRABENT         |              | Not Filed  | \$0             | 0  | 12/04/2018 | \$3,828     | 549            | NONE       |
| 3509 | BILL HOPKINS FOR CONGRESS                 | WILLIAM E. HOPKINS JR. | C00670414    | WILLIAM E. HOPKINS JR. |              | Not Filed  | \$998           | 0  | 12/04/2018 | \$3,828     | 549            | \$333      |
| 3510 | BILLY KOVACS FOR CONGRESS                 | WILLIAM RICHARD KOVACS | C00636175    | BILLY KOVACS           |              | Not Filed  | \$20,606 (est)  | 0  | 12/04/2018 | \$667       | 549            | \$667      |
| 3512 | COMMITTEE TO ELECT HP                     | HAMID PARVIZIAN        | C00663104    | DOUNIA METOURI         |              | Not Filed  | \$106,911 (est) | 0  | 12/04/2018 | \$6,380     | 549            | \$6,380    |
| 3513 | CORI BUSH FOR CONGRESS                    | CORI BUSH              | C00638767    | CORI BUSH              | 12/06/2018   | Not Filed* | \$89,941        | 0  | 12/04/2018 | \$1,200     | 549            | \$1,200    |
| 3514 | DAS FOR CONGRESS                          | ABHIJIT BEEJ DAS       | C00657445    | SEAN SMITH             | 12/26/2018   | Not Filed* | \$236,589       | 0  | 12/04/2018 | \$9,214     | 549            | \$9,214    |
| 3515 | DOROTHY GASQUE FOR CONGRESS               | DOROTHY GASQUE         | C00630798    | MEGAN JONES            |              | Not Filed  | \$19,152 (est)  | 0  | 12/04/2018 | \$667       | 549            | \$667      |
| 3516 | DOUG MCLINKO FOR CONGRESS                 | DOUG MCLINKO           | C00661900    | HELEN SANTIAGO         | 12/19/2018   | Not Filed* | \$31            | 0  | 12/04/2018 | \$3,828     | 549            | \$31       |
| 3518 | ETHAN PHAM FOR CONGRESS                   | ETHAN PHAM             | C00650929    | JENNY NGUYEN           |              | Not Filed  | \$0             | 0  | 12/04/2018 | \$7,797     | 549            | NONE       |
| 3520 | FRIENDS OF EDDIE SUNDQUIST                | EDWARD A. SUNDQUIST    | C00641175    | ELLIOT S. RAIMONDO     | 03/14/2019   | Not Filed* | \$10,259        | 0  | 12/04/2018 | \$1,200     | 549            | \$667      |
| 3521 | FRIENDS OF EDWIN SANTANA JR. FOR CONGRESS | EDWIN SANTANA JR.      | C00630434    | TRACY LEE SANTANA      | 04/15/2019   | Not Filed* | \$274           | 0  | 12/04/2018 | \$667       | 549            | \$274      |
| 3522 | FRIENDS OF RAY LINSENMAYER                | RAYMOND LINSENMAYER    | C00661066    | DAVID HAMBURGER        | 02/01/2019   | Not Filed* | \$0             | 0  | 12/04/2018 | \$1,200     | 549            | NONE       |
| 3524 | GOLDEN FOR CONGRESS                       | IAN GOLDEN             | C00649285    | IAN GOLDEN             | 01/31/2019   | Not Filed* | \$25,367        | 0  | 12/04/2018 | \$1,200     | 549            | \$1,200    |
| 3525 | HART 2020                                 | HART P. CUNNINGHAM     | C00664086    | HART C. CUNNINGHAM     |              | Not Filed  | \$0             | 0  | 12/04/2018 | \$9,214     | 549            | NONE       |
| 3527 | JOSH KIMBRELL FOR CONGRESS                | JOSHUA BRETT KIMBRELL  | C00672899    | FRANK ROGERS           | 01/28/2019   | Not Filed* | \$2,744         | 0  | 12/04/2018 | \$11,341    | 549            | \$333      |
| 3529 | LIBERATORE FOR CONGRESS-2018              | PHIL LIBERATORE        | C00674325    | LOUIS BAGLIETTO JR.    | 01/30/2019   | Not Filed* | \$0             | 0  | 12/04/2018 | \$7,797     | 549            | NONE       |
| 3531 | MARTY GEARHEART FOR CONGRESS              | MARTY GEARHEART        | C00664516    | NISHANT GROVER         |              | Not Filed  | \$60,887 (est)  | 0  | 12/04/2018 | \$3,828     | 549            | \$3,828    |
| 3532 | MORGAN DUNN FOR CONGRESS                  | MORGAN DUNN            | C00668129    | CHRIS DUNN             | 10/22/2018   | 7          | \$25,196        | 0  | 12/04/2018 | \$472       | 549            | \$472      |
| 3534 | OMAR VAID FOR CONGRESS                    | OMAR M. VAID           | C00647313    | OMAR VAID              | 04/05/2019   | Not Filed* | \$23,524        | 0  | 12/04/2018 | \$3,828     | 549            | \$667      |
| 3537 | ROEL GARCIA FOR CONGRESS                  | ROEL GARCIA            | C00661256    | ROCIO GARCIA           | 05/15/2019   | Not Filed* | \$113           | 0  | 12/04/2018 | \$1,200     | 549            | \$113      |
| 3538 | ROZA CALDERON FOR CONGRESS 2018           | ROZA I. CALDERON       | C00640755    | MICHAEL WILIAMS        |              | Not Filed  | \$32,375 (est)  | 1  | 12/04/2018 | \$1,500     | 549            | \$1,500    |
| 3539 | SOL FLORES FOR CONGRESS                   | SOL FLORES             | C00662130    | JENNIFER MAY           | 01/31/2019   | Not Filed* | \$319           | 0  | 12/04/2018 | \$7,797     | 549            | \$319      |
| 3540 | SULLIVAN FOR CONGRESS                     | JOE SULLIVAN           | C00652388    | JOE SMENTEK            | 11/26/2018   | Not Filed* | \$27,269        | 0  | 12/04/2018 | \$1,200     | 549            | \$1,200    |
| 3542 | TIM RICH FOR CONGRESS                     | TIMOTHY A. RICH        | C00649368    | TIMOTHY A. RICH        |              | Not Filed  | \$45,538 (est)  | 0  | 12/04/2018 | \$1,200     | 549            | \$1,200    |
| 3543 | TO ELECT JENNY MARSHALL                   | JENNIFER MARSHALL      | C00629881    | JENNIFER MARSHALL      |              | Not Filed  | \$39,092 (est)  | 0  | 12/04/2018 | \$1,200     | 549            | \$1,200    |
| 3545 | VOTE SANGARI                              | SARGIS SANGARI         | C00658450    | JOSEPH TAMRAZ          | 02/04/2019   | Not Filed* | \$0             | 0  | 12/04/2018 | \$1,200     | 549            | NONE       |
| 3546 | ZACH SCOTT FOR CONGRESS                   | ZACH SCOTT             | C00662338    | JULIE KEMP             | 05/23/2019   | Not Filed* | \$3,774         | 0  | 12/04/2018 | \$1,200     | 549            | \$333      |

\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

## BEFORE THE FEDERAL ELECTION COMMISSION

|  |   |          |
|--|---|----------|
| In the Matter of                       | ) |          |
|  | ) |          |
| Withdrawal and Resubmission of Final   | ) |          |
| Determination Recommendation - 2018    | ) |          |
| October Quarterly Report (Non-Election | ) |          |
| Sensitive) for the Administrative Fine | ) |          |
| Program:                               | ) |          |
| BILL HOPKINS FOR CONGRESS, and         | ) | AF# 3509 |
| HOPKINS, WILLIAM E. JR. as treasurer;  | ) |          |
| BILLY KOVACS FOR CONGRESS, and         | ) | AF# 3510 |
| KOVACS, BILLY as treasurer;            | ) |          |
| COMMITTEE TO ELECT HP, and             | ) | AF# 3512 |
| METOURI, DOUNIA as treasurer;          | ) |          |
| CORI BUSH FOR CONGRESS, and            | ) | AF# 3513 |
| BUSH, CORI as treasurer;               | ) |          |
| DAS FOR CONGRESS, and SMITH,           | ) | AF# 3514 |
| SEAN as treasurer;                     | ) |          |
| DOROTHY GASQUE FOR CONGRESS,           | ) | AF# 3515 |
| and JONES, MEGAN as treasurer;         | ) |          |
| DOUG MCLINKO FOR CONGRESS, and         | ) | AF# 3516 |
| SANTIAGO, HELEN as treasurer;          | ) |          |
| DR KATHIE ALLEN FOR CONGRESS,          | ) | AF# 3517 |
| and ALLEN, KATHRYN DR. as treasurer;   | ) |          |
| FRIENDS OF EDDIE SUNDQUIST, and        | ) | AF# 3520 |
| RAIMONDO, ELLIOT S. as treasurer;      | ) |          |
| FRIENDS OF EDWIN SANTANA JR.           | ) | AF# 3521 |
| FOR CONGRESS, and SANTANA,             | ) |          |
| TRACY LEE as treasurer;                | ) |          |
| GOLDEN FOR CONGRESS, and               | ) | AF# 3524 |
| GOLDEN, IAN as treasurer;              | ) |          |
| JOSH KIMBRELL FOR CONGRESS, and        | ) | AF# 3527 |
| ROGERS, FRANK as treasurer;            | ) |          |
| MARK MACKENZIE FOR CONGRESS,           | ) | AF# 3530 |
| and GEOFFROY, RONALD P as treasurer;   | ) |          |
| MARTY GEARHEART FOR CONGRESS,          | ) | AF# 3531 |
| and GROVER, NISHANT as treasurer;      | ) |          |
| MORGAN DUNN FOR CONGRESS, and          | ) | AF# 3532 |
| DUNN, CHRIS as treasurer;              | ) |          |

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|   |   |          |
|---|---|----------|
| OMAR VAID FOR CONGRESS, and<br>VAID, OMAR as treasurer;                   | ) | AF# 3534 |
| REUBEN FOR CONGRESS, and KING,<br>BREON as treasurer;                     | ) | AF# 3536 |
| ROEL GARCIA FOR CONGRESS, and<br>GARCIA, ROCIO as treasurer;              | ) | AF# 3537 |
| ROZA CALDERON FOR CONGRESS<br>2018, and WILIAMS, MICHAEL as<br>treasurer; | ) | AF# 3538 |
| SOL FLORES FOR CONGRESS, and<br>MAY, JENNIFER as treasurer;               | ) | AF# 3539 |
| SULLIVAN FOR CONGRESS, and<br>SMENTEK, JOE as treasurer;                  | ) | AF# 3540 |
| TIM RICH FOR CONGRESS, and RICH,<br>TIMOTHY A as treasurer;               | ) | AF# 3542 |
| TO ELECT JENNY MARSHALL, and<br>MARSHALL, JENNIFER as treasurer;          | ) | AF# 3543 |
| ZACH SCOTT FOR CONGRESS, and<br>KEMP, JULIE as treasurer;                 | ) | AF# 3546 |

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 29, 2020 the Commission took the following actions on the Withdrawal and Resubmission of Final Determination Recommendation - 2018 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated June 05, 2020, on the following committees:

AF#3509 Decided by a vote of 4-0 to: (1) make a final determination that BILL HOPKINS FOR CONGRESS, and HOPKINS, WILLIAM E. JR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so

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indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3510 Decided by a vote of 4-0 to: (1) make a final determination that BILLY KOVACS FOR CONGRESS, and KOVACS, BILLY in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3512 Decided by a vote of 4-0 to: (1) make a final determination that COMMITTEE TO ELECT HP, and METOURI, DOUNIA in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3513 Decided by a vote of 4-0 to: (1) make a final determination that CORI BUSH FOR CONGRESS, and BUSH, CORI in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3514 Decided by a vote of 4-0 to: (1) make a final determination that DAS FOR CONGRESS, and SMITH, SEAN in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3515 Decided by a vote of 4-0 to: (1) make a final determination that DOROTHY GASQUE FOR CONGRESS, and JONES, MEGAN in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3516 Decided by a vote of 4-0 to: (1) make a final determination that DOUG MCLINKO FOR CONGRESS, and SANTIAGO, HELEN in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3517 Decided by a vote of 4-0 to: (1) make a final determination that DR KATHIE ALLEN FOR CONGRESS, and ALLEN, KATHRYN DR. in her official

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capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3520 Decided by a vote of 4-0 to: (1) make a final determination that FRIENDS OF EDDIE SUNDQUIST, and RAIMONDO, ELLIOT S. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3521 Decided by a vote of 4-0 to: (1) make a final determination that FRIENDS OF EDWIN SANTANA JR. FOR CONGRESS, and SANTANA, TRACY LEE in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3524 Decided by a vote of 4-0 to: (1) make a final determination that GOLDEN FOR CONGRESS, and GOLDEN, IAN in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3527 Decided by a vote of 4-0 to: (1) make a final determination that JOSH KIMBRELL FOR CONGRESS, and ROGERS, FRANK in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3530 Decided by a vote of 4-0 to: (1) make a final determination that MARK MACKENZIE FOR CONGRESS, and GEOFFROY, RONALD P in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3531 Decided by a vote of 4-0 to: (1) make a final determination that MARTY GEARHEART FOR CONGRESS, and GROVER, NISHANT in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3532 Decided by a vote of 4-0 to: (1) make a final determination that MORGAN DUNN FOR CONGRESS, and DUNN, CHRIS in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3534 Decided by a vote of 4-0 to: (1) make a final determination that OMAR VAID FOR CONGRESS, and VAID, OMAR in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3536 Decided by a vote of 4-0 to: (1) make a final determination that REUBEN FOR CONGRESS, and KING, BREON in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3537 Decided by a vote of 4-0 to: (1) make a final determination that ROEL GARCIA FOR CONGRESS, and GARCIA, ROCIO in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3538 Decided by a vote of 4-0 to: (1) make a final determination that ROZA CALDERON FOR CONGRESS 2018, and WILIAMS, MICHAEL in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3539 Decided by a vote of 4-0 to: (1) make a final determination that SOL FLORES FOR CONGRESS, and MAY, JENNIFER in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3540 Decided by a vote of 4-0 to: (1) make a final determination that SULLIVAN FOR CONGRESS, and SMEN TEK, JOE in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3542 Decided by a vote of 4-0 to: (1) make a final determination that TIM RICH FOR CONGRESS, and RICH, TIMOTHY A in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3543 Decided by a vote of 4-0 to: (1) make a final determination that TO ELECT JENNY MARSHALL, and MARSHALL, JENNIFER in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3546 Decided by a vote of 4-0 to: (1) make a final determination that ZACH SCOTT FOR CONGRESS, and KEMP, JULIE in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.



Attest:

**Laura Sinram**

Digitally signed by Laura  
 Sinram  
 Date: 2020.07.27 14:48:45  
 -04'00'

Laura E. Sinram  
 Acting Secretary and Clerk of the  
 Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

July 30, 2020

Ronald P. Geoffroy, in official capacity as Treasurer  
Mark Mackenzie for Congress  
319 W. Erie St.  
Manchester, NH 03102

C00660126  
AF#: 3530

Dear Mr. Geoffroy,

On December 4, 2018, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Mark Mackenzie for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the October Quarterly Report. By letter dated December 6, 2018, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$268 in accordance with the schedule of penalties at 11 CFR § 111.43.

On December 24, 2018, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on June 29, 2020 that Mark Mackenzie for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$268 in accordance with 11 CFR § 111.43, and voted to close the file.

The confidentiality provisions at 52 U.S.C. § 30109(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 this matter, please contact Ben Holly on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

Sincerely,

A handwritten signature in black ink that reads "J.E. Trainor, III".

James E. "Trey" Trainor III  
Chair

THIS IS THE END OF ADMINISTRATIVE FINE CASE #3530