

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #3619

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FEDERAL ELECTION COMMISSION

2019 MAR 19 PM 2:31

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 2019

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer
Staff Director *AP*

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

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser *KDR*
Compliance Branch

SUBJECT: Reason to Believe Recommendation -
Failure to File 48-Hour Notices under the Administrative Fine Program

Attached is the name of a principal campaign committee that has failed to file 48-hour notices with the Commission for contributions of \$1,000.00 or more received from the close of books for the 2018 12 Day Pre-General Report up to 48 hours before the November 6, 2018 General Election in accordance with 52 U.S.C. § 30104(a) and 11 CFR. § 104.5(f). The committee, Maria Elvira Salazar for Congress, represents a candidate who lost the General Election. The committee is being referred for failing to file 48-hour notices for contributions totaling \$113,612.40.

A 48-hour notice is required to report all contributions of a \$1,000.00 or more, to any authorized committee of a candidate, including contributions from the candidate, loans from the candidate and other non-bank sources and endorsements or guarantees of loans from banks, as per 11 CFR § 104.5(f).

We have attached an information sheet which includes the contributor name, date of receipt and amount of the contributions for which a 48-hour notice was not filed.

In accordance with the schedule of civil money penalties outlined within 11 CFR § 111.44, this committee should be assessed the civil money penalty so indicated.

Recommendation

1. Find reason to believe that Maria Elvira Salazar and Santiago Pujals, in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that a civil money penalty of \$11,799 be assessed.
2. Send the appropriate letter.

Attachment

Contributions for Which a 48-Hour Notice Was Not Received

AF 3619

Committee ID: C00671859

Committee Name: Maria Elvira Salazar for Congress

Report Type: 2018 30 Day Post-General Report (10/18/2018 – 11/26/2018)

48-Hour Reporting Period: 10/18/2018 – 11/3/2018

CONTRIBUTOR	DATE	AMOUNT
ALEXANDER, JOHN	10/22/2018	\$1,732.59
AUSTIN, ROBERT	10/22/2018	\$2,700.00
COURT, JAIME	10/24/2018	\$1,732.60
		
PASKO, MIKE	10/26/2018	\$1,647.21
		
ALTRIA GROUP, INC POLITICAL ACTION COMMITTEE / ALTRIAPAC	10/30/2018	\$2,500.00
ALVAREZ, AMADO ALAN	10/30/2018	\$1,000.00
ANTHONY GONZALEZ FOR CONGRESS	10/30/2018	\$2,000.00
BEAUCHAMP, JAMES B D	10/30/2018	\$1,000.00
BLOOMIN' BRANDS, INC. PAC	10/30/2018	\$5,000.00
BUDDY PAC	10/30/2018	\$1,000.00
BURUM, JEFFERY S	10/30/2018	\$2,000.00
CARR, JAMES	10/30/2018	\$2,700.00
CARR, SUSAN S	10/30/2018	\$2,700.00
COSCULLUELA, EUGENIO J.	10/30/2018	\$1,000.00
COSIO, ALBERTO	10/30/2018	\$1,000.00
CRUZ, CLEMENTE	10/30/2018	\$2,700.00
CRUZ, TERESA	10/30/2018	\$2,700.00
DE LA CRUZ, CLAUDIA	10/30/2018	\$1,000.00
DIAZ, MANUEL	10/30/2018	\$2,500.00
DODDRIDGE, WILLIAM S	10/30/2018	\$2,000.00
DOWD, LOUISE W	10/30/2018	\$1,000.00
FABAR, LAURA M	10/30/2018	\$1,000.00
FELDENKREIS, OSCAR	10/30/2018	\$2,000.00
FIDALGO, EDWARD	10/30/2018	\$1,000.00
FINAZZO, JULIA R	10/30/2018	\$2,700.00
FINAZZO, NICK	10/30/2018	\$2,700.00
FINAZZO, ROSE ANN	10/30/2018	\$2,700.00
FOSLID, ADAM M	10/30/2018	\$1,000.00
FRELINGHUYSEN FOR CONGRESS	10/30/2018	\$1,000.00

HERNANDEZ, YANET	10/30/2018	\$1,000.00
HUCK JR., PAUL C	10/30/2018	\$1,000.00
IMPACT COMMITTEE	10/30/2018	\$1,000.00
INDEPENDENT INSURANCE AGENTS & BROKERS OF AMERICA, INC. POLITICA ACTION COMMITTEE	10/30/2018	\$2,500.00
IPHFHA POLITICAL ACTION COMMITTEE	10/30/2018	\$2,000.00
KLEPACH, BERNARD	10/30/2018	\$1,000.00
LEON, PATRICK A	10/30/2018	\$1,000.00
LOEB, DANIEL	10/30/2018	\$2,700.00
MAKING AMERICA PROSPEROUS PAC KEVIN GRADY, CHAIRMAN	10/30/2018	\$2,000.00
MARATHON PETROLEUM CORPORATION EMPLOYEES POLITICAL ACTION COMMITTEE	10/30/2018	\$1,000.00
MIAMI ASSOCIATION OF FIRE FIGHTERS IAFF LOCAL 587 PAC	10/30/2018	\$1,000.00
MIDDELTHON JR, WILLAIM R	10/30/2018	\$1,000.00
MIYARES, ANDRIA C	10/30/2018	\$1,000.00
MORENO, JUAN CARLOS	10/30/2018	\$1,000.00
MOSKOWITZ, MICHAEL	10/30/2018	\$2,700.00
NATIONAL ELECTRICAL CONTRACTORS ASSOCIATION PAC	10/30/2018	\$2,500.00
NUNBERG, JEFFERY S	10/30/2018	\$2,700.00
OUR COUNTRY DESERVES BETTER PACT-TEA PARTY EXPRESS	10/30/2018	\$1,000.00
PERDOMO-CANTERO, ANA	10/30/2018	\$1,000.00
PINERA-VAZQUEZ, SILVIA B	10/30/2018	\$1,000.00
PRELLEZO, ESTEBAN	10/30/2018	\$1,000.00
REPUBLICAN PARTY OF MIAMI DADE COUNTY FEDERAL ACCOUNT	10/30/2018	\$1,000.00
ROWE, JOHN W	10/30/2018	\$2,700.00
RUDMAN, FRANK	10/30/2018	\$1,700.00
SCHNAPP, ROBERTO	10/30/2018	\$2,400.00
SLAWSON, STEPHEN	10/30/2018	\$2,700.00
TERNER, SALOMON	10/30/2018	\$1,000.00
TOVAR, ROGELIO	10/30/2018	\$1,000.00
TRUMP, JULIUS	10/30/2018	\$2,700.00
VADIA, RICARDO JUAN	10/30/2018	\$1,000.00
VILLALON, MINET M	10/30/2018	\$2,700.00
VILLIAMS, JAMES	10/30/2018	\$2,500.00
YATES, LINDA	10/30/2018	\$2,700.00

YATES, PEYTON	10/30/2018	\$2,700.00
	TOTAL	\$113,612.40

Proposed Civil Money Penalty: \$11,799 ((3 Notices Not Filed at \$146 each) + (10% of the Overall Contributions Not Reported))

Federal Election Commission
Reason to Believe Circulation Report
48-Hour Notification Report

3/19/2019 9:53 AM

AF#	Committee ID	Committee Name	State	Election	Candidate Name	Treasurer	Prev Violations	Notices Not Filed	LOA	Penalty
3619	C00671859	MARIA ELVIRA SALAZAR FOR CONGRESS	FL	2018	MARIA ELVIRA SALAZAR	MR. SANTIAGO PUJALS	0	3	\$113,612	\$11,799

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3619
 Reason to Believe Recommendation -)
 Failure to File 48-Hour Notices under the)
 Administrative Fine Program: Maria)
 Elvira Salazar and Santiago Pujals, in his)
 official capacity as treasurer)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 21, 2019, the Commission decided by a vote of 4-0 to take the following actions in AF 3619:

1. Find reason to believe that Maria Elvira Salazar and Santiago Pujals, in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that a civil money penalty of \$11,799 be assessed.
2. Send the appropriate letter.

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

Attest:

March 21, 2019
Date

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 25, 2019

Mr. Santiago Pujals, in official capacity as Treasurer
Maria Elvira Salazar for Congress
P.O. Box 558033
Miami, FL 33255

C00671859
AF#: 3619

Dear Mr. Pujals:

The Federal Election Campaign Act of 1971, as amended, 52 U.S.C. § 30101, *et seq.* ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing the Federal Election Commission ("FEC") and the Secretary of State, as appropriate, of any contribution of \$1,000 or more, received by any authorized committee of the candidate after the 20th day, but more than 48 hours before, any election. 52 U.S.C. § 30104(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* These notification requirements are in addition to all other reporting requirements. 52 U.S.C. § 30104(a). Our records indicate that Maria Elvira Salazar for Congress did not submit 48-Hour Notices for contributions of \$1,000 or more, received between October 18, 2018 and November 3, 2018, totaling \$113,612, as required by 52 U.S.C. § 30104(a)(6)(A). Attachment 1.

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 March 21, 2019, the FEC found that there is Reason to Believe ("RTB") that Maria Elvira Salazar for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file the 48-Hour Notices. Based on the FEC's schedule of civil money penalties at 11 CFR § 111.44, the amount of your civil money penalty calculated at the RTB stage is \$11,799. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 2. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. The amount of the civil money penalty is \$146 for each non-filed notice plus 10 percent of the dollar amount of the contributions not timely reported. The civil money penalty increases by 25 percent for each prior violation. Send your payment of \$11,799 within forty (40) days of the finding, or by April 30, 2019.

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 April 30, 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.

1. 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 Maria Elvira Salazar 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).

2. 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.

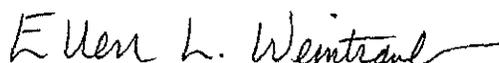
5. Settlement Offers

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 Jamie Sikorsky 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. 1158) or (202) 694-1158.

On behalf of the Commission,



Ellen L. Weintraub
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.44, the amount of your civil money penalty calculated at RTB is \$11,799 for the 2018 General Election 48-Hour Notification 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 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

FOR: Maria Elvira Salazar for Congress

FEC ID#: C00671859

AF#: 3619

PAYMENT DUE DATE: April 30, 2019

PAYMENT AMOUNT DUE: \$11,799

Contributions for Which a 48-Hour Notice Was Not Received

AF 3619

Committee ID: C00671859

Committee Name: Maria Elvira Salazar for Congress

Report Type: 2018 30 Day Post-General Report (10/18/2018 – 11/26/2018)

48-Hour Reporting Period: 10/18/2018 – 11/3/2018

CONTRIBUTOR	DATE	AMOUNT
ALEXANDER, JOHN	10/22/2018	\$1,732.59
AUSTIN, ROBERT	10/22/2018	\$2,700.00
COURT, JAIME	10/24/2018	\$1,732.60
PASKO, MIKE	10/26/2018	\$1,647.21
ALTRIA GROUP, INC POLITICAL ACTION COMMITTEE / ALTRIAPAC	10/30/2018	\$2,500.00
ALVAREZ, AMADO ALAN	10/30/2018	\$1,000.00
ANTHONY GONZALEZ FOR CONGRESS	10/30/2018	\$2,000.00
BEAUCHAMP, JAMES B D	10/30/2018	\$1,000.00
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BUDDY PAC	10/30/2018	\$1,000.00
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CARR, JAMES	10/30/2018	\$2,700.00
CARR, SUSAN S	10/30/2018	\$2,700.00
COSCULLUELA, EUGENIO J.	10/30/2018	\$1,000.00
COSIO, ALBERTO	10/30/2018	\$1,000.00
CRUZ, CLEMENTE	10/30/2018	\$2,700.00
CRUZ, TERESA	10/30/2018	\$2,700.00
DE LA CRUZ, CLAUDIA	10/30/2018	\$1,000.00
DIAZ, MANUEL	10/30/2018	\$2,500.00
DODDRIDGE, WILLIAM S	10/30/2018	\$2,000.00
DOWD, LOUISE W	10/30/2018	\$1,000.00
FABAR, LAURA M	10/30/2018	\$1,000.00
FELDENKREIS, OSCAR	10/30/2018	\$2,000.00
FIDALGO, EDWARD	10/30/2018	\$1,000.00
FINAZZO, JULIA R	10/30/2018	\$2,700.00
FINAZZO, NICK	10/30/2018	\$2,700.00
FINAZZO, ROSE ANN	10/30/2018	\$2,700.00
FOSLID, ADAM M	10/30/2018	\$1,000.00
FRELINGHUYSEN FOR CONGRESS	10/30/2018	\$1,000.00

HERNANDEZ, YANET	10/30/2018	\$1,000.00
HUCK JR., PAUL C	10/30/2018	\$1,000.00
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IPHFHA POLITICAL ACTION COMMITTEE	10/30/2018	\$2,000.00
KLEPACH, BERNARD	10/30/2018	\$1,000.00
LEON, PATRICK A	10/30/2018	\$1,000.00
LOEB, DANIEL	10/30/2018	\$2,700.00
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MARATHON PETROLEUM CORPORATION EMPLOYEES POLITICAL ACTION COMMITTEE	10/30/2018	\$1,000.00
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MIDDELTHON JR, WILLAIM R	10/30/2018	\$1,000.00
MIYARES, ANDRIA C	10/30/2018	\$1,000.00
MORENO, JUAN CARLOS	10/30/2018	\$1,000.00
MOSKOWITZ, MICHAEL	10/30/2018	\$2,700.00
NATIONAL ELECTRICAL CONTRACTORS ASSOCIATION PAC	10/30/2018	\$2,500.00
NUNBERG, JEFFERY S	10/30/2018	\$2,700.00
OUR COUNTRY DESERVES BETTER PACT-TEA PARTY EXPRESS	10/30/2018	\$1,000.00
PERDOMO-CANTERO, ANA	10/30/2018	\$1,000.00
PINERA-VAZQUEZ, SILVIA B	10/30/2018	\$1,000.00
PRELLEZO, ESTEBAN	10/30/2018	\$1,000.00
REPUBLICAN PARTY OF MIAMI DADE COUNTY FEDERAL ACCOUNT	10/30/2018	\$1,000.00
ROWE, JOHN W	10/30/2018	\$2,700.00
RUDMAN, FRANK	10/30/2018	\$1,700.00
SCHNAPP, ROBERTO	10/30/2018	\$2,400.00
SLAWSON, STEPHEN	10/30/2018	\$2,700.00
TERNER, SALOMON	10/30/2018	\$1,000.00
TOVAR, ROGELIO	10/30/2018	\$1,000.00
TRUMP, JULIUS	10/30/2018	\$2,700.00
VADIA, RICARDO JUAN	10/30/2018	\$1,000.00
VILLALON, MINET M	10/30/2018	\$2,700.00
VILLIAMS, JAMES	10/30/2018	\$2,500.00
YATES, LINDA	10/30/2018	\$2,700.00

YATES, PEYTON	10/30/2018	\$2,700.00
TOTAL		\$113,612.40

Proposed Civil Money Penalty: \$11,799 ((3 Notices Not Filed at \$146 each) + (10% of the Overall Contributions Not Reported))

MARIA ELVIRA SALAZAR FOR CONGRESSRECEIVED
MAIL CENTER
2019 JUN 20 AM 11:59

June 19, 2019

Ellen L Weintraub
Chair
Federal Election Commission
Washington, DC 20463RE: Maria Elvira Salazar for Congress
Committee ID # C00671859
48-Hour Reporting Period (10/18/2018 to 11/3/2018)
AF#: 3619

Dear Ms. Weintraub:

The purpose of this letter is to respond to your letter of March 25, 2019 and explain the circumstances which resulted in the campaign's alleged failure to file 48-Hour reports to report various contributions of \$1,000 or more received during the October 11, 2018 to November 18, 2018 period. For the record, we want to note that we received said letter via e-mail from Jaime Sikorski on May 20, 2019, since the original letter apparently was returned to you by the post office although properly addressed. We also want to thank you for allowing us until today to respond.

To facilitate our response, we will address the alleged failures in four groups:

1. The contributions received on 10/30/2018 – totaling \$105,800.00.
2. The in-kind contributions received:

<u>From</u>	<u>Reported as received on</u>	<u>Amount</u>
John Alexander	10/22/18	\$1732.59
Jaime Court	10/24/18	\$1732.60
Total		<u>\$3465.19</u>

3. Mike Pasko 10/26/18 \$1,647.21
4. Robert Austin 10/22/18 \$2,700.00

#1. The Commission alleges that the campaign failed to file the 48-Hour report due on 10/31/18 to report contributions received on 10/30/18. The campaign did file the 10/31/18 48-Hour report, attached as Exhibit 1C is the related FEC Filing Confirmation. It appears that when the campaign filed its 48 hour report on 10/31/18 reporting all contributions of \$1,000 or more received on 10/30/18, the FEC's reporting system picked up a previously filed 48-hour report (the report filed on 10/23/18) as the report filed by the campaign on 10/31/18. Attached are a series of documents illustrating the sequence of events:

- a) Exhibit 1A - The campaign prepared the 10/31/18, 48-Hour report reporting all contributions of \$1,000 or more received on 10/30/18.
- b) Exhibit 1B -The report was reviewed and the filing approved by the proper campaign staff
- c) Exhibit 1C - "Filing Confirmation Report" indicating the report was filed on 10/31/18 at 5:23:43 PM.
- d) Exhibit 1D - When you do a search of the FEC reporting system asking for the report with filing ID: FEC-1287710, the system produces the 48-Hour Report filed on 10/23/18.

The campaign filed the report due on 10/31/18 on a timely basis. We are unable to explain why the FEC reporting system picked up a previously filed report as the report being filed on 10/31/18; furthermore, we cannot understand why the Commission's staff failed to detect that the system had improperly picked up a previously filed report and, as such, should have created a series of duplicate contributions. The campaign took all actions necessary to comply with its filing requirements, always intended to comply with said requirements, and did fulfill its obligations. We don't believe the campaign should be penalized when the fault was not theirs.

#2. The Commission alleges that the campaign failed to file a 48-Hour report(s) to disclose the in-kind contributions made by John Alexander and Jaime Court on or about 10/24/18.

The alleged in-kind contributions resulted from the actions of Mr. Alexander and Mr. Court when they decided, unbeknown to the campaign, to pay for an event held by the campaign on October 24, 2018 at the Riviera Country Club in Coral Gables, Florida. The campaign did not know that these individuals were going to pay for the event and did not become aware of their intentions until Election Day. As previously stated, an authorized campaign representative, on behalf of the campaign, signed Event Order #RC14626 on October 16, 2018 for the event to be held on October 24th, see Exhibit 2A. On November 6th, Election Day, the campaign was advised of the intent of these individual to pay for the event; by then, it was too late to file any 48-Hour report related to this alleged in-kind contributions. Furthermore, an analysis of Mr. Court's Country Club member's account statement reveals that he actually did not pay the country club until November 24, 2018 for the event charges – See Exhibits 2B and 2C; accordingly, the campaign was still responsible for these charges until the payment was made. We were not able to obtain similar statements for Mr. Alexander, and we must respect his rights to privacy.

When the campaign became aware of the intent to make the in-kind contributions it reported them on its regular campaign report; no 48-hour campaign report was filed since by November 6th, it was too late to do so. Staff dated the contributions as having been received on 10/22 and 10/24 – since the event was held on 10/24, both of these contributions, if the campaign had been aware of their intent, would have been reported as of 10/24. We don't believe the campaign should be penalized for failing to file a 48-

Hour Report when it had no knowledge of the parties' intent to make the in-kind contribution until it was too late to do so.

#3. The Commission alleges that the campaign failed to file a 48-Hour report to disclose the in-kind contributions made by Mike Pasko on 10/26/18.

First we apologize, the contribution was attributed to the wrong individual; our research indicates that it should have been attributed to the Joe Wilson's LPAC. We will amend the report to correct this matter.

Attached as Exhibit 3A is an e-mail from Sue Carlin of Centric Office dated 11/20/18 advising us of the in-kind contribution. Once again, the campaign did not become aware of the in-kind contribution until after the period for filing 48-Hour reports was well past. The staff dated the contribution as 10/26/18 (since that was the last date on which the charges were incurred) on its regular campaign report.

We don't believe the campaign should be penalized for failing to report a contribution in a 48-hour report when it was not aware the contribution had been made. The contribution was reported on the campaigns normal report when the campaign was notified it had been made.

#4. The Robert Austin contribution of \$2,700 should have been reported on the 10/23/18 48-Hour Report but due to a breakdown in the campaign procedures it was omitted. This was a failure on the campaign's part to comply with reporting obligations.

Throughout the campaign our intent was to fully comply with all reporting guidelines and we continue committed to doing so in the future. We did err, as stated in #4 above; we did fail to include Robert Austin's \$2,700 contribution in a 48-Hour Report. However, on Item #1, we did prepare and file the required 48-Hour Report and, on items #2 and #3, the campaign did not become aware of the "reportable in-kind contributions" until it was too late for said contributions to be reported on a 48-Hour Report. We respectfully request that in light of the foregoing facts the Commission reconsider the assessed penalties. If you have any questions or require any additional information, please let us know.

Yours truly



Santiago Pujals

Treasurer

Maria Elvira Salazar for Congress Campaign

1450 Brickell Avenue, 18th Floor

Miami, FL 33131

48-HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL MARIA ELVIRA SALAZAR FOR CONGRESS			
ADDRESS (number and street) P.O. Box 558033			
CITY Miami	STATE FL	ZIP CODE 33255-8033	
2. NAME OF CANDIDATE Salazar, Maria Elvira, , ,		3. OFFICE SOUGHT (State and District) House FL 27	4. FEC IDENTIFICATION NUMBER C00671859
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON _____			
A. FULL NAME ALVAREZ, AMADO, ALAN, ,		Name of Employer THE ALVAREZ TRIAL LAW FIRM, PA	Date (month, day, year) 10/30/2018
MAILING ADDRESS 13124 SW 106 AVENUE		Transaction ID : F6.8823	Amount 1000.00
CITY MIAMI	STATE FL	ZIP CODE 33176	Occupation ATTORNEY
B. FULL NAME ANTHONY GONZALEZ FOR CONGRESS		Name of Employer	Date (month, day, year)
MAILING ADDRESS 9856 ARCHER LN		Transaction ID : F6.8824	Amount 2000.00
CITY DUBLIN	STATE OH	ZIP CODE 43017	Occupation
C. FULL NAME BEAUCHAMP, JAMES, B D, ,		Name of Employer BEACHAMP CONSTRUCTION	Date (month, day, year)
MAILING ADDRESS 3916 GRANADA BLVD		Transaction ID : F6.8825	Amount 1000.00
CITY CORAL GABLES	STATE FL	ZIP CODE 33134	Occupation PRESIDENT
D. FULL NAME BUDDY PAC		Name of Employer	Date (month, day, year)
MAILING ADDRESS 824 S MILLEDGE AVENUE STE 101		Transaction ID : F6.8827	Amount 1000.00
CITY ATHENS	STATE GA	ZIP CODE 30605	Occupation
E. FULL NAME BURUM, JEFFERY, S, ,		Name of Employer BUCELO LAW GROUP	Date (month, day, year)
MAILING ADDRESS 10621 CIVIC CENTER DR		Transaction ID : F6.8828	Amount 2000.00
CITY RANCHO CUCAMONGA	STATE CA	ZIP CODE 91730	Occupation CHAIRMAN
SIGNATURE (optional) PUJALS, SANTIAGO, , Mr.,		DATE	For further information contact: Federal Election Commission 999 E Street, NW, Washington, DC 20463 Toll Free 800 424 9530, Local 202 694 1100

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5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON _____			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE CARR, JAMES, , , 81 PALM AVENUE MIAMI BEACH FL 33139		Name of Employer CC RESIDENTIAL Transaction ID : F6.8829 Occupation CEO	Date (month, day, year) 10/30/2018 Amount 2700.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE CARR, SUSAN, S, , 81 PALM AVE MIAMI BEACH FL 33139		Name of Employer CC RESIDENTIAL Transaction ID : F6.8830 Occupation VP	Date (month, day, year) 10/30/2018 Amount 2700.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE COSCULLUELA, EUGENIO, J., , 7700 N KENDALL DRIVE STE 705 MIAMI FL 33156		Name of Employer COFE INVESTMENT Transaction ID : F6.8831 Occupation CEO	Date (month, day, year) 10/30/2018 Amount 1000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE COSIO, ALBERTO, , , 3601 ALHAMBRA CT CORAL GABLES FL 33134		Name of Employer MERRIL LYNCH Transaction ID : F6.8832 Occupation BANKER	Date (month, day, year) 10/30/2018 Amount 1000.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE CRUZ, CLEMENTE, , , 15635 SW 17TH STREET WESTON FL 33326		Name of Employer RETIRED Transaction ID : F6.8833 Occupation RETIRED	Date (month, day, year) 10/30/2018 Amount 2700.00

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5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON _____ / _____ / _____			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE CRUZ, TERESA, , , 15635 SW 17TH STREET WESTON FL 33326		Name of Employer RETIRED Transaction ID : F6.8834 Occupation RETIRED	Date (month, day, year) 10/30/2018 Amount 2700.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE DE LA CRUZ, CLAUDIA, , , 460 S MASHTA DR KEY BISCAVNE FL 33149		Name of Employer RETIRED Transaction ID : F6.8835 Occupation RETIRED	Date (month, day, year) 10/30/2018 Amount 1000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE DIAZ, MANUEL, , , 8901 ARVIDA LANE CORAL GABLES FL 33156		Name of Employer MANUEL DIAZ FARMS Transaction ID : F6.8836 Occupation CEO	Date (month, day, year) 10/30/2018 Amount 2500.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE DODDRIDGE, WILLIAM, S, , 13562 ISLEWOOD DRIVE ANACORTES WA 98221		Name of Employer GOLDENWEST DIAMOND CORP Transaction ID : F6.8837 Occupation CEO	Date (month, day, year) 10/30/2018 Amount 2000.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE DOWD, LOUISE, W, , 8720 BAY COLONY DR UNIT 303 NAPLES FL 34108		Name of Employer RETIRED Transaction ID : F6.8838 Occupation RETIRED	Date (month, day, year) 10/30/2018 Amount 1000.00

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<i>continuation page</i>			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE FABAR, LAURA, M, , 4649 PONCE DE LEON BLVD #495 CORAL GABLES FL 33146	Name of Employer EQUELA LAW FIRM Transaction ID : F6.8839 Occupation ATTORNEY	Date (month, day, year) 10/30/2018	Amount 1000.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE FELDENKREIS, OSCAR, , , 5222 NORTH BAY ROAD MIAMI BEACH FL 33140	Name of Employer PERRY ELLIS, INC. Transaction ID : F6.8840 Occupation VP	Date (month, day, year) 10/30/2018	Amount 2000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE FIDALGO, EDWARD, , , 190 Island Drive KEY BISCAZYNE FL 33149	Name of Employer MIAMI OB GYN LLC Transaction ID : F6.8841 Occupation MEDICAL DOCTOR	Date (month, day, year) 10/30/2018	Amount 1000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE FINAZZO, NICK, , , 8545 OLD CUTLER RD CORAL GABLES FL 33156	Name of Employer AER SALES Transaction ID : F6.8843 Occupation CEO	Date (month, day, year) 10/30/2018	Amount 2700.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE FOSLID, ADAM, M, , 1457 BLUE RD CORAL GABLES FL 33146	Name of Employer GREENBERG T Transaction ID : F6.8844 Occupation ATTORNEY	Date (month, day, year) 10/30/2018	Amount 1000.00

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A. FULL NAME, MAILING ADDRESS AND ZIP CODE FRELINGHUYSEN FOR CONGRESS 19 CATTANO AVE MORRISTOWN NJ 07960		Name of Employer Transaction ID : F6.8845 Occupation	Date (month, day, year) 10/30/2018 Amount 1000.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE HERNANDEZ, YANET, , , 211 SW 134TH AVE MIAMI FL 33184		Name of Employer HOMEMAKER Transaction ID : F6.8846 Occupation HOMEMAKER	Date (month, day, year) 10/30/2018 Amount 1000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE HUCK JR., PAUL, C, , 600 BRICKELL STE 3300 MIAMI FL 33131		Name of Employer JONES DAE LAW FIRM Transaction ID : F6.8847 Occupation ATTORNEY	Date (month, day, year) 10/30/2018 Amount 1000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE INDEPENDENT INSURANCE AGENTS & BROKERS OF AMERICA, INC. POLITICA ACTION COMMITTEE 20 F STREET NW SUITE 610 WASHINGTON DC 20001		Name of Employer Transaction ID : F6.8849 Occupation	Date (month, day, year) 10/30/2018 Amount 2500.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE KLEPACH, BERNARD, , , 555 NE 185TH ST #201 MIAMI FL 33179		Name of Employer DFASS Transaction ID : F6.8851 Occupation CEO	Date (month, day, year) 10/30/2018 Amount 1000.00

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A. FULL NAME, MAILING ADDRESS AND ZIP CODE LEON, PATRICK, A, , 4100 GALT OCEAN DR #203 FORT LAUDERDALE FL 33308	Name of Employer SELF EMPLOYED Transaction ID : F6.8852 Occupation CONTRACTOR	Date (month, day, year) 10/30/2018	Amount 1000.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE LOEB, DANIEL, , , 390 PARK AVENUE 18TH FLOOR NEW YORK NY 10022	Name of Employer THIRD POINT ADVISOR, LLC Transaction ID : F6.8853 Occupation CHIEF EXECUTIVE	Date (month, day, year) 10/30/2018	Amount 2700.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE MAKING AMERICA PROSPEROUS PAC KEVIN GRADY, CHAIRMAN PO BOS 2485 SPRINGFIELD VA 22152	Name of Employer Transaction ID : F6.8854 Occupation	Date (month, day, year) 10/30/2018	Amount 2000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE MIAMI ASSOCIATION OF FIRE FIGHTERS IAFF LOCAL 587 PAC 2980 NW SOUTH RIVER DIRVE MIAMI FL 33125	Name of Employer Transaction ID : F6.8856 Occupation	Date (month, day, year) 10/30/2018	Amount 1000.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE MIDDELTHON JR, WILLAIM R, , , 1441 BARACOA AVE CORAL GABLES FL 33146	Name of Employer BEST EFFORTS Transaction ID : F6.8857 Occupation ATTORNEY	Date (month, day, year) 10/30/2018	Amount 1000.00

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<i>continuation page</i>			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE			
MIYARES, ANDRIA, C, , 11100 SNAPPER CREEK RD CORAL GABLES FL 33156		Name of Employer ANDRIA MIYARES, LLC Transaction ID : F6.8858 Occupation CEO	Date (month, day, year) 10/30/2018 Amount 1000.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE			
MORENO, JUAN, CARLOS, , 502 NW 34TH AVE MIAMI FL 33125		Name of Employer 3K CAMAGUEY LLC Transaction ID : F6.8859 Occupation CEO	Date (month, day, year) 10/30/2018 Amount 1000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE			
MOSKOWITZ, MICHAEL, , , 310 Lexington Avenue Apt PHB NEW YORK CITY NY 10016		Name of Employer SELF-EMPLOYED Transaction ID : F6.8860 Occupation FINANCE	Date (month, day, year) 10/30/2018 Amount 2700.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE			
NUNBERG, JEFFERY, S, , 3545 ANCHORAGE WAY COCONUT GROVE FL 33133		Name of Employer INTEGRATED SECURITY SYSTEMS Transaction ID : F6.8862 Occupation CEO	Date (month, day, year) 10/30/2018 Amount 2700.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE			
OUR COUNTRY DESERVES BETTER PACT-TEA PARTY EXPRESS PO BOX 730 HILMAR CA 95324		Name of Employer Transaction ID : F6.8863 Occupation	Date (month, day, year) 10/30/2018 Amount 1000.00

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A. FULL NAME, MAILING ADDRESS AND ZIP CODE PERDOMO-CANTERO, ANA, , , 1408 DORADO AVE CORAL GABLES FL 33146	Name of Employer HOMEMAKER Transaction ID : F6.8864 Occupation HOMEMAKER	Date (month, day, year) 10/30/2018	Amount 1000.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE PINERA-VAZQUEZ, SILVIA, B, , 3516 ALHAMBRA CIRCLE CORAL GABLES FL 33134	Name of Employer THE PINERA-VAZQUEZ LAW FIRM Transaction ID : F6.8865 Occupation ATTORNEY	Date (month, day, year) 10/30/2018	Amount 1000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE PRELLEZO, ESTEBAN, , , 8765 SW 53 COURT MIAMI FL 33143	Name of Employer MERRIL LYNCH Transaction ID : F6.8866 Occupation FINANCIAL ADVISOR	Date (month, day, year) 10/30/2018	Amount 1000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE RINAZZO, ROSE, ANN, , 8545 OLD CUTLER RD CORAL GABLES FL 33143	Name of Employer HOMEMAKER Transaction ID : F6.8868 Occupation HOMEMAKER	Date (month, day, year) 10/30/2018	Amount 2700.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE ROWE, JOHN W, , , PO BOX 805398 CHICAGO IL 60680	Name of Employer RETIRED Transaction ID : F6.8869 Occupation RETIRED	Date (month, day, year) 10/30/2018	Amount 2700.00

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5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE RUDMAN, FRANK, , , 6501 NE 2 CT MIAMI FL 33138	Name of Employer SPORTAILOR, INC. Transaction ID : F6.8870 Occupation EXECUTIVE	Date (month, day, year) 10/30/2018	Amount 1700.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE SCHNAPP, ROBERTO, , , 3601 CARLTON PL BOCA RATON FL 33496	Name of Employer RETIRED Transaction ID : F6.8883 Occupation RETIRED	Date (month, day, year) 10/30/2018	Amount 2400.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE SLAWSON, STEPHEN, , , 612 ISLINGTON PL JOPLIN MO 64801	Name of Employer MERCY CLINIC JOPLIN Transaction ID : F6.8872 Occupation RADIOLOGIST	Date (month, day, year) 10/30/2018	Amount 2700.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE TERNER, SALOMON, , , 1425 BRICKELL AVE APT 61E MIAMI FL 33131	Name of Employer RETIRED Transaction ID : F6.8873 Occupation RETIRED	Date (month, day, year) 10/30/2018	Amount 1000.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE TOVAR, ROGELIO, , , PO BOX 143975 CORAL GABLES FL 33114	Name of Employer RT HOLDINGS Transaction ID : F6.8874 Occupation PRESIDENT	Date (month, day, year) 10/30/2018	Amount 1000.00

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A. FULL NAME, MAILING ADDRESS AND ZIP CODE TRUMP, JULIUS, , , 4000 WEST ISLAND BLVD AVENTURA FL 33160	Name of Employer TRUMP GROUP Transaction ID : F6.8875 Occupation R E. DEVELOPER	Date (month, day, year) 10/30/2018	Amount 2700.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE VADIA, RICARDO, JUAN, , , 6930 GRANADA BLVD CORAL GABLES FL 33146	Name of Employer ROVR DEVELOPMENT Transaction ID : F6.8876 Occupation PRINCIPAL	Date (month, day, year) 10/30/2018	Amount 1000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE VILLALON, MINET, M, , , 10245 COLLINS AVENUE #7F BALHARBOUR FL 33154	Name of Employer SECURE WRAP INC Transaction ID : F6.8877 Occupation CEO	Date (month, day, year) 10/30/2018	Amount 2700.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE VILLIAMS, JAMES, , , , 648 PALERMO AVE CORAL GABLES FL 33134	Name of Employer RETIRED Transaction ID : F6.8878 Occupation RETIRED	Date (month, day, year) 10/30/2018	Amount 2500.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE YATES, LINDA, , , , PO BOX 1020 ARTESIA FL 88211	Name of Employer ASPEN GLOBAL LEADERSHIP NETWORK Transaction ID : F6.8879 Occupation CEO	Date (month, day, year) 10/30/2018	Amount 2700.00

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48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL MARIA ELVIRA SALAZAR FOR CONGRESS			
ADDRESS (number and street) P.O. Box 558033			
CITY, STATE, and ZIP CODE Miami FL 33255 8033			
2. NAME OF CANDIDATE Salazar, Maria Elvira, , ,		3. OFFICE SOUGHT (State and District) House FL 27	
4. FEC IDENTIFICATION NUMBER C00671859		<i>continuation page</i>	
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON _____ / _____ / _____			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE YATES, PEYTON, , , PO BOX 1020 ARTESIA NM 88211	Name of Employer NEW MEXICO COMMUNITY CAPITAL Transaction ID : F6.8880 Occupation VICE PRESIDENT	Date (month, day, year) 10/30/2018	Amount 2700.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE ALTRIA GROUP, INC POLITICAL ACTION COMMITTEE / ALTRIAPAC 101 CONSTITUTION AVENUE NW STE 400 WASHINGTON DC 20001	Name of Employer Transaction ID : F6.8822 Occupation	Date (month, day, year) 10/30/2018	Amount 2500.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE BLOOMIN' BRANDS, INC. PAC 2202 N. WEST SHORE BLVD TAMPA FL 33607	Name of Employer Transaction ID : F6.8826 Occupation	Date (month, day, year) 10/30/2018	Amount 5000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE FINAZZO, JULIA, R, , 8545 OLD CUTLER RD CORAL GABLES FL 33143	Name of Employer STUDENT Transaction ID : F6.8842 Occupation STUDENT	Date (month, day, year) 10/30/2018	Amount 2700.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE IMPACT COMMITTEE 617 E CUSTIS AVE ALEXANDRIA VA 22301	Name of Employer Transaction ID : F6.8848 Occupation	Date (month, day, year) 10/30/2018	Amount 1000.00

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

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1. NAME OF COMMITTEE IN FULL MARIA ELVIRA SALAZAR FOR CONGRESS			
ADDRESS (number and street) P.O. Box 558033			
CITY, STATE, and ZIP CODE Miami FL 33255 8033			
2. NAME OF CANDIDATE Salazar, Maria Elvira, , ,		3. OFFICE SOUGHT (State and District) House FL 27	
4. FEC IDENTIFICATION NUMBER C00671859			
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON _____			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE IPHFHA POLITICAL ACTION COMMITTEE 7829 EAST ROCKHILL STE 201 WICHITA KS 67206	Name of Employer Transaction ID : F6.8850 Occupation	Date (month, day, year) 10/30/2018	Amount 2000.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE MARATHON PETROLEUM CORPORATION EMPLOYEES POLITICAL ACTION COMMITTEE 539 S MAIN STREET FINDLAY OH 45840	Name of Employer Transaction ID : F6.8855 Occupation	Date (month, day, year) 10/30/2018	Amount 1000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE NATIONAL ELECTRICAL CONTRACTORS ASSOCIATION PAC 3 BETHESDA METRO CENTER SUITE #110 BETHESDA MD 20814	Name of Employer Transaction ID : F6.8861 Occupation	Date (month, day, year) 10/30/2018	Amount 2500.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE REPUBLICAN PARTY OF MIAMI DADE COUNTY FEDERAL ACCOUNT 1460 NW 107 AVE DORAL DORAL FL 33156	Name of Employer Transaction ID : F6.8867 Occupation	Date (month, day, year) 10/30/2018	Amount 1000.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE	Name of Employer Occupation	Date (month, day, year)	Amount

continuation page

EXHIBIT 1B

Veciana, Jr, Antonio

From: Vivian Vega <vivian@mariaelvira.tv>
Sent: Wednesday, October 31, 2018 5:20 PM
To: Veciana, Jr, Antonio
Cc: Torgas, Ed S.; Sosa, Melvin
Subject: RE: MES 48HR Report 10-30 2018

CAUTION: External Sender

OK , approved.

Vivian Vega



www.mariaelvira.com

Twitter @MaElviraSalazar



From: Veciana, Jr, Antonio [mailto:aveciana@mbafcpa.com]
Sent: Wednesday, October 31, 2018 4:37 PM
To: 'Vivian Vega'
Cc: Torgas, Ed S. ; Sosa, Melvin
Subject: MES 48HR Report 10-30-2018

Vivian,
Find attached the MES 48HR Report 10-30 2018 for review and approval to file today.
Kindly advise.

Tony

EXHIBIT 1C**Veciana, Jr, Antonio**

From: noreply_efiling@fec.gov
Sent: Wednesday, October 31, 2018 1:24 PM
To: Veciana, Jr, Antonio
Subject: FEC: F6N Filing Accepted

CAUTION: External Sender



FEC electronic filing results

Your filing was received and accepted by our system on 10/31/2018 05:23:43 PM, and was assigned the Filing ID: FEC-1287710

Committee ID: C00671859
Committee name: MARIA ELVIRA SALAZAR FOR
CONGRESS
Form type: F6N (New Report)

Schedule:

From/through: -

Filing

software/version: FECfile/8.3.0.0(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/ZRWK18103142949>

If you are receiving this email in error or have any questions, please contact the FEC Electronic Filing Office toll-free at (800) 424-9530 ext. 1307 or locally at (202) 694-1307.

[Online webforms](#) | [Reset password](#) | [Download FECFile](#)

[FEC.gov](#) | [Electronic filing overview](#) | [Privacy Policy](#)

EXHIBIT 1D

Veciana, Jr, Antonio

From: noreply_efiling@fec.gov
Sent: Wednesday, October 31, 2018 1:24 PM
To: Veciana, Jr, Antonio
Subject: FEC: F6N Filing Accepted

CAUTION: External Sender



FEC electronic filing results

Your filing was received and accepted by our system on 10/31/2018 05:23:43 PM, and was assigned the Filing ID: FEC-1287710

Committee ID: C00671859
Committee name: MARIA ELVIRA SALAZAR FOR
CONGRESS

Form type: F6N (New Report)

Schedule:

From/through:

Filing

software/version: FECfile/8.3.0.0(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/ZRWK18103142949>

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48-HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL MARIA ELVIRA SALAZAR FOR CONGRESS			
ADDRESS (number and street) P O Box 558033			
CITY Miami	STATE FL	ZIP CODE 33255 8033	
2. NAME OF CANDIDATE Salazar, Maria Elvira, , ,		3. OFFICE SOUGHT (State and District) House FL 27	
4. FEC IDENTIFICATION NUMBER C00671859			
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON 10 / 23 / 2018			
A. FULL NAME ANDREUS, ALEXANDER, , ,		Name of Employer BRICKELL MOTORS	
MAILING ADDRESS 5945 SW 29 STREET		Date (month, day, year) 10/22/2018	
Transaction ID : F6.8052		Amount 2700.00	
CITY MIAMI	STATE FL	ZIP CODE 33155	Occupation COO
B. FULL NAME ANDREUS, DENISE, , ,		Name of Employer HOMEMAKER	
MAILING ADDRESS 5945 SW 29 STREET		Date (month, day, year) 10/22/2018	
Transaction ID : F6.8053		Amount 2700.00	
CITY MIAMI	STATE FL	ZIP CODE 33155	Occupation HOMEMAKER
C. FULL NAME BLANFORD, LAWRENCE, , ,		Name of Employer RETIRED	
MAILING ADDRESS 7575 PELICAN BAY BLVD UNIT 1104		Date (month, day, year) 10/22/2018	
Transaction ID : F6.8054		Amount 1000.00	
CITY NAPLES	STATE FL	ZIP CODE 34108	Occupation RETIRED
D. FULL NAME BUILD OUR FUTURE PAC		Name of Employer	
MAILING ADDRESS C/O 610 S BLVD		Date (month, day, year) 10/22/2018	
Transaction ID : F6.8055		Amount 1000.00	
CITY TAMPA	STATE FL	ZIP CODE 33606	Occupation
E. FULL NAME BUSINESS INDUSTRY POLITICAL ACTION COMMITTEE		Name of Employer	
MAILING ADDRESS 1707 L STREET, NW		Date (month, day, year) 10/22/2018	
Transaction ID : F6.8057		Amount 1000.00	
CITY WASHINGTON	STATE DC	ZIP CODE 20036	Occupation
SIGNATURE (optional) PUJALS, SANTIAGO, , Mr.,		DATE 10/23/2018	For further information contact: Federal Election Commission 999 E Street, NW, Washington, DC 20463 Toll Free 800 424 9530, Local 202 694 1100
<i>[Electronically Filed]</i>			

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48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

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1. NAME OF COMMITTEE IN FULL MARIA ELVIRA SALAZAR FOR CONGRESS			
ADDRESS (number and street) P.O. Box 558033			
CITY, STATE, and ZIP CODE Miami FL 33255-8033			
2. NAME OF CANDIDATE Salazar, Maria Elvira, , ,		3. OFFICE SOUGHT (State and District) House FL 27	4. FEC IDENTIFICATION NUMBER C00671859
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON 10 / 23 / 2018			
<i>continuation page</i>			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE GAMBLE, KATHRYN, , , 459 WEST BELDEN AVENUE CHICAGO IL 60614	Name of Employer LINCOLN PARK ZOO Transaction ID : F6.8058 Occupation VETERINARIN	Date (month, day, year) 10/22/2018	Amount 2700.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE KOPP, JAY AND MARY PAT, , , 2341 TECUMSEH DRIVE WEST PALM BEACH FL 33409	Name of Employer RETIRED Transaction ID : F6.8060 Occupation RETIRED	Date (month, day, year) 10/22/2018	Amount 2000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE MCQUILLAN, KARIN, , , 1400 QUEENS LANE JACKSON WY 83001	Name of Employer RETIRED Transaction ID : F6.8061 Occupation RETIRED	Date (month, day, year) 10/22/2018	Amount 1000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE MURGADO, BIBIANA, , , 665 SW 8 STREET MIAMI FL 33130	Name of Employer RETIRED Transaction ID : F6.8062 Occupation RETIRED	Date (month, day, year) 10/22/2018	Amount 2700.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE MURGADO, MARIO, , , 665 SW 8 STREET MIAMI FL 33130	Name of Employer BRICEKLL MOTORS Transaction ID : F6.8063 Occupation CEO	Date (month, day, year) 10/22/2018	Amount 2700.00

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL MARIA ELVIRA SALAZAR FOR CONGRESS			
ADDRESS (number and street) P.O. Box 558033			
CITY, STATE, and ZIP CODE Miami FL 33255 8033		<i>continuation page</i>	
2. NAME OF CANDIDATE Salazar, Maria Elvira, , ,	3. OFFICE SOUGHT (State and District) House FL 27	4. FEC IDENTIFICATION NUMBER C00671859	
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON 10 / 23 / 2018			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE MURGADO JR, MARIO, , , 10320 SW 88 AVENUE MIAMI FL 33176	Name of Employer BRICKELL MOTORS Transaction ID : F6.8064 Occupation GENERAL MANAGER	Date (month, day, year) 10/22/2018	Amount 2700.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE OASIS, RUSS, , , 4840 SW 80 ST MIAMI FL 33143	Name of Employer RETIRED Transaction ID : F6.8065 Occupation RETIRED	Date (month, day, year) 10/22/2018	Amount 1000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE VETTER, DOUGLAS, , , 401 HARRISON STREET UNIT 30B SAN FRANCISCO CA 94105	Name of Employer APPLE INC Transaction ID : F6.8067 Occupation ATTORNEY	Date (month, day, year) 10/22/2018	Amount 2000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE ICE PAC PO BOX 752 LONG LAKE MN 55356	Name of Employer Transaction ID : F6.8059 Occupation	Date (month, day, year) 10/22/2018	Amount 1000.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE TEXANS FOR JODEY ARRINGTON 228 S WASHINGTON ST STE 115 ALEXANDRIA VA 22314	Name of Employer Transaction ID : F6.8066 Occupation	Date (month, day, year) 10/22/2018	Amount 1000.00

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FEC FORM 6
(Revised 07/2011)

EXHIBIT 2A



Riviera Country Club

EVENT ORDER: RC14626

Event Date: Wednesday, October 24, 2018

Event Name: MARIA ELVIRA SALAZAR'S SPECIAL GUEST
HOUSE MAJORITY LEADER KEVIN MCCARTHY RECEPTION

Site: Riviera Country Club

Salesperson: Gloria Morales

Contact: Jaime Court

Mailing Address:

Coral Gables, FL 33146

E-mail:

Daytime Phone:

Fax Number:

On-Site Contact: Mr. Court

Day/Date	Start/End Time	Location	Function	Set-Up	Est	Gte	Set	Rental
Wed., 10/24/18	11:30AM- 1:30PM	Salon	Cocktail Reception		40			\$0.00

FOOD	QTY	PRICE	TOTAL
11:30 AM / SALON / COCKTAIL RECEPTION			
Passed Hors D'Oeuvres (Minimum of 50 pieces each)			
<i>Hot Selections</i>			
Sesame Fried Chicken with Honey Mustard Dipping Sauce	50	\$2.80	\$140.00
Crispy Crab Cake with Ginger Aioli	50	\$4.00	\$200.00
Vegetable Spring Roll with Sweet and Sour Sauce	50	\$2.80	\$140.00
Mini Beef Empanadas	50	\$3.40	\$170.00
<i>Cold Selections</i>			
House Smoked Salmon and Caviar Crème Fraiche on Potato Galette	50	\$3.40	\$170.00
<i>Reception Display</i>			
Cheese	40	\$12.00	\$480.00
Domestic and Imported Cheeses, Grapes, Dried Fruit, Nuts, Crackers, Lavosch and Sliced Toasted Baguette			
Assorted Finger Sandwiches - Tuna, Chicken, Egg Salad, Ham & Cheese, Turkey & Swiss	40	\$10.00	\$400.00
<i>Dessert</i>			
Assorted Cookies and Coffee Station	40	\$4.00	\$160.00

BEVERAGE	QTY	PRICE	TOTAL
11:30 AM / SALON / COCKTAIL RECEPTION			
Bar Charge Based on Consumption			
House Wine, Canyon Road, Chardonnay & Cabernet - - \$25 per bottle			
Draft Beer - \$5 each			
Assorted Soft Drinks - \$3 each			

SET-UP & SERVICE	QTY	PRICE	TOTAL
11:30 AM / SALON / COCKTAIL RECEPTION			
REGISTRATION TABLE: One skirted 6' table with two chairs outside entrance.			
SEATING: Cocktail Seating 3 Hi-Tops 4 Low Tops of 5 ppl White Linens			
CENTERPIECES: By Host			
SET UP: Bar			
STAFF FEE: Bartender and Servers	4	\$150.00	\$600.00
VALET: Price per person (adults only)	40	\$2.50	\$100.00
SERVICE CHARGE: Service Charge of 22% Added to all Food & Beverage			

ESTIMATED CHARGES (Actual Charges Presented At Conclusion of Event)						
	Charges	Service Charge 22.00 %	Subtotal	Tax 1 Rate	Tax 1	Total
Facility Rental	\$0.00	\$0.00	\$0.00	7.0000%	\$0.00	\$0.00
Food	\$1,860.00	\$409.20	\$2,269.20	7.0000%	\$158.84	\$2,428.04
Beverage	\$0.00	\$0.00	\$0.00	7.0000%	\$0.00	\$0.00
Set-Up	\$700.00	\$0.00	\$700.00	7.0000%	\$49.00	\$749.00
Grand Totals	\$2,560.00	\$409.20	\$2,969.20		\$207.84	\$3,177.04
Payments Received						\$0.00
Method of Payment:						Balance Due
						\$3,177.04

CUSTOMER ACCEPTANCE: I understand that a Guaranteed Guest amount is required three business days prior to the event. Your charges will be based on the guaranteed number of guest or actual attendance, whichever is higher.

Signature: _____

Diana Jimenez Espinosa

Date: _____

10/16/18

Riviera Country Club
1155 Blue Rd, Coral Gables FL 33146
305-661-5331

0.*

3,177.04 +
TIPS 288.15 +
002
✓ 3,465.19*

EXHIBIT 2B

Statement



Account #	Date
	10/31/2018

Jaime Court
Coral Gables, FL 33146

Current	Over 30	Over 60	Over 90	Balance Due
---------	---------	---------	---------	-------------

Date	Reference	Description	Amount	Service Charge	Tax	Total
------	-----------	-------------	--------	----------------	-----	-------

10/24/2018	1793383	Event: María Elvira Salazar's Special Gue.	\$2,789.75	\$448.75	\$226.69	\$3,465.19
10/24/2018	1797612	Misc. Charges: credit 1/2 of Event: Marl...	(\$1,732.60)	\$0.00	\$0.00	(\$1,732.60)

billing inquiries, call Melanie Segovia at 305-661 5331 ext. 257

Minimum	To Date	Balance	As Of	Ending
			10/31/2018	

Riviera Country Club
1155 Blue Road
Coral Gables, FL 33146
(305) 661-5331

EXHIBIT 2C

Statement



Account #	Date
	11/30/2018

Jaime Court

Current	Over 30	Over 60	Over 90	Balance Due
---------	---------	---------	---------	-------------

Coral Gables, FL 33146

Date	Reference	Description	Amount	Service Charge	Tax	Total
------	-----------	-------------	--------	----------------	-----	-------

11/24/2018	1811939	Payment				(\$2,828.43)
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Balance is due by the end of the month. Any payments not made 30 days from the due date will be subject to a late fee of 1.5%. For billing inquiries, call Melanie Segovia at 305 661 5331 ext. 257

Minimum	To Date	Balance	As Of	Ending
			11/30/2018	

Riviera Country Club
1155 Blue Road
Coral Gables, FL 33146
(305) 661 5331

EXHIBIT 3A**Veciana, Jr, Antonio**

From: Sue Carlin <sue.carlin@concentricoffice.com>
Sent: Monday, November 19, 2018 2:57 PM
To: Torgas, Ed S.; Veciana, Jr, Antonio
Subject: Maria Elvira Salazar for Congress
Attachments: 20181119140647015.pdf

CAUTION: External Sender

Attached is an in-kind contribution from Speak Up America PAC (Joe Wilson's LPAC), A hard copy was mailed to campaign.

Thanks,

Sue Carlin
Concentric Office
703.569.9481 (o)
703.405.6141 (c)

SPEAK UP AMERICA PAC

Hon. Joe Wilson
Chairman

Robert F. Carlin
Treasurer

Post Office Box 2485
Springfield, VA 22152

703 569-9481
Fax 703 569-9004

November 6, 2018

Maria Elvira Salazar for Congress
PO Box 558033
Miami, FL 332558033

Dear Ms. Salazar,

This letter confirms my leadership PAC's in-kind contribution of \$1,647.21 to your general election. This in-kind contribution was for the following:

- \$194.20, 10/20/2018, American Airlines
- \$511.78, 10/22/2018, Hotwire (Car Rental)
- \$941.23, 10/26/2018, Courtyard by Marriott, 9075 S. Dadeland Blvd, Miami, FL 33156

Sincerely,



Joe Wilson
Congressman, SC-02



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 16, 2019

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

AF# 3619 – Maria Elvira Salazar for Congress and Santiago Pujals, in his official capacity as Treasurer (C00671859)

Summary of Recommendation

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess an \$11,799 civil money penalty.

Reason-to-Believe Background

In connection with the 2018 General Election held on November 6, 2018, the respondents were required to file 48-Hour Notices of Contributions/Loans ("48-Hour Notices") for contributions of \$1,000 or more received between October 18, 2018 and November 3, 2018.

On March 21, 2019, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file a 48-Hour Notices for 63 contributions totaling \$113,612.40 and made a preliminary determination that the civil money penalty was \$11,799 based on the schedule of penalties at 11 C.F.R. § 111.44. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on March 25, 2019 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") requires that the principal campaign committee of a candidate must notify the Commission, in writing, of any contribution of \$1,000 or more received after the 20th day but more than 48 hours before an election. The principal campaign committee must notify the Commission within 48 hours of receipt of the contribution. The 48-hour notification shall be in addition to all other reporting requirements under the Act. 52 U.S.C. § 30104(a)(6)(A) and 11 C.F.R. § 104.5(f). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Summary of Respondents' Challenge

On June 20, 2019, the Commission received the written response (“challenge”) from the Treasurer. The challenge provides an explanation for the 63 contributions cited in the RTB finding, as discussed below.

Erroneous 48-Hour Notice of October 31, 2018

The challenge states that the Committee did electronically file a 48-Hour Notice on October 31, 2018 to cover the 59 contributions received on October 30, 2018. However, the Committee explains:

...the FEC’s reporting system picked up a previously filed 48-hour report (the report filed on 10/23/18) as the report filed by the campaign on 10/31/18...[W]e cannot understand why the Commission’s staff failed to detect that the system had improperly picked up a previously filed report and, as such, should have created a series of duplicate contributions.

In-Kind Contributions

The Committee further explains that the 2 contributions from John Alexander and Jaime Court “resulted from the actions of Mr. Alexander and Mr. Court when they decided, unbeknown to the campaign, to pay for an event held by the campaign on October 24, 2018.” The campaign became aware of their intent to pay for the event on November 6, 2018, after the 48-Hour Notice Period. The challenge further explains that Mr. Court’s records indicate he did not make the payment until November 24, 2018.¹ The Committee reported the contributions as received on October 22 and October 24, 2018. “Since the event was held on 10/24, both of these contributions, if the campaign had been aware of their intent, would have been reported as of 10/24.”

The challenge clarifies that the in-kind contribution from Mike Pasko on October 26, 2018 was incorrectly attributed. The Committee is amending its report to correctly attribute this contribution to Joe Wilson’s LPAC. The Committee was not aware of the in-kind contribution until November 20, 2018. The Committee reported the contribution as received on October 26, 2018 “since that was the last date charges were incurred.”

Procedural Error

Lastly, the Committee explains that the contribution from Robert Austin should have been reported on the 48-Hour Notice filed October 23, 2018. The Committee failed to comply with reporting obligations due to a breakdown in procedures.

The Treasurer highlights that the Committee should not be penalized for in-kind contributions it was not aware of until after the 48-Hour Notice period. Further, the Committee has been and will continue to be committed to complying with reporting obligations. For these reasons, the Treasurer requests that the Commission reconsider the penalty assessed.

¹ Similar records are not available for Mr. Alexander’s payment.

OAR Analysis

Erroneous 48-Hour Notice of October 31, 2018

The Reviewing Officer requested additional information from the Commission's Electronic Filing Office ("EFO") with respect to the Committee's contention that it appropriately filed the October 31, 2018 48-Hour Notice, but the FEC incorrectly pulled a previously filed 48-Hour Notice. EFO states:

The FECFile upload process is executed as a "push" from the user and not a "pull" from the FEC. The user executes the upload process by choosing a report, closing and dating that same report, and submitting the report to the FEC by clicking the "Upload Your Report Button." The FEC's Electronic Filing System in no manner selects a report from the user's FECFile database which resides on the user's computer. Therefore, the respondents' contention that the FEC picked up a previous filing is not possible.

In response to the Committee's statement that the FEC should have recognized that it was a duplicate filing, EFO explains:

The FEC Electronic Filing System does perform a check to prevent exact duplicate filings. The filing of 10/31/2018 included the date of 10/23/2018 in the "Yes, it amends the notice filed on" field, which was not included on the 10/23/2018 filing. Therefore, the System did not consider the 10/31/2018 filing to be an exact duplicate of the 10/23/2018 filing.

Commission records indicate the Committee previously had technical difficulty filing 48-Hour Notices. Various Committee representatives sought assistance related to filing 48-Hour Notices on multiple occasions between August 14 and October 23, 2018. The most recent communication log is from October 23, 2018, when the Commission confirmed receipt of the Committee's 48-Hour Notice filing of that same day.

While the Reviewing Officer recognizes the Committee may have appropriately prepared the October 31, 2018 48-Hour Notice in FECFile, the Committee failed to upload that filing to the FEC. A committee's failure to use filing software properly is specifically included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) with respect to the 59 contributions totaling \$105,800.

In-Kind Contributions

With respect to the in-kind contributions from John Alexander, Jaime Court, and Mike Pasko², the Reviewing Officer recognizes the Committee may not have been aware of the contributions until after the 48-Hour Notice period. However, the date of receipt for in-kind contributions is the date the goods or services are provided to the committee.

² The Committee states in the challenge that it will amend the 2018 Post-General Report to correctly attribute this contribution to Joe Wilson's LPAC. To date, this amendment has not been filed.

11 C.F.R. § 110.1(b)(6). In addition, page 23 of the *Campaign Guide for Congressional Candidates and Committees* specifically explains: “The date of receipt for an in-kind contribution is the date the goods or services are provided to the committee, **even if the contributor pays the bill for the goods or services after they are provided.**” (emphasis added)

The Committee confirms that, despite their knowledge, the goods and/or services were received by the Committee within the 48-Hour Notice period. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) with respect to these 3 contributions totaling \$5,112.40.

Procedural Error

The Committee acknowledges that, due to a procedural error, it failed to include the contribution from Robert Austin on the 48-Hour Notice filed October 23, 2018. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) with respect to this single contribution totaling \$2,700.

OAR Conclusion

The challenge fails to adequately address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. 11 C.F.R. § 104.14(d). Failure to use filing software properly, inexperience, and negligence are specifically included at 11 C.F.R. § 111.35(d) as examples of a circumstance that will not be considered reasonably unforeseen and beyond the respondents’ control. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess an \$11,799 civil money penalty.

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 3619 involving Maria Elvira Salazar for Congress and Santiago Pujals, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3619 that Maria Elvira Salazar for Congress and Santiago Pujals, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess an \$11,799 civil money penalty; and
3. Send the appropriate letter.

Attachments

Attachment 1 –

Attachment 2 –

Attachment 3 – Page 23 of *Campaign Guide for Congressional Candidates and Committees*

Attachment 4 – Declaration from RAD

Attachment 5 – Declaration from OAR

Contribution Limits

Date Contribution is Made

The date a contribution is made is the date the contributor relinquishes control over it. 110.1(b)(6).

For example:

- A hand-delivered contribution is considered made on the date it is delivered by the contributor to the campaign. 110.1(b)(6).
- A mailed contribution is made on the date of the postmark. 110.1(b)(6). Note that if a campaign wishes to rely on a postmark as evidence of the date a contribution was made, it must retain the envelope or a copy of it. 110.1(l)(4).
- An in-kind contribution is made on the date that the goods or services are provided by the contributor. See AOs 2004-36 and 1996-29.
- A contribution made via the Internet is considered made on the date the contributor electronically confirms making the transaction. AO 1995-09.
- An earmarked contribution is considered made during the election cycle in which the contribution is actually made, regardless of the year in which the election is held. See AOs 2008-08 and 2006-30 (footnote 5). (Note that the conduit must forward this information to the campaign.) See Appendix A for more information.

Date Contribution is Received

The date of receipt is the date the campaign (or a person acting on the campaign's behalf) actually receives the contribution. 102.8(a). This is the date used by the campaign for reporting purposes, but it also affects the application of the net debts outstanding rule (discussed in Section 8 of this chapter).

Contributions Charged on Credit Cards

When the committee receives contributions through credit card charges, the date of receipt is the date on which the committee receives the contributor's signed authorization to charge the contribution. The treasurer should retain a copy of the authorization form in the committee's records. See AOs 1995-09 and 1990-04.

In-Kind Contributions

The date of receipt for an in-kind contribution is the date the goods or services are provided to the committee, even if the contributor pays the bill for the goods or services after they are provided. See 110.1(b)(6).

Effect of Dates on Undesignated Contributions

The date an undesignated contribution is made determines which election limit it counts against. The date of receipt, however, does not affect the application of the contribution limits. An undesignated contribution made on or before Election Day counts against the donor's limit for that election, even if the date of receipt is after Election Day and even if the campaign has no net debts outstanding. On the other hand, an undesignated contribution made after an election counts against the donor's limit for the candidate's next election. 110.1(b)(2)(ii).

Effect of Dates on Designated Contributions

Both the date a contribution is made and the date of receipt affect the application of the net debts outstanding rule to a designated contribution. The date the contribution is made determines whether the rule will apply, while the date of receipt governs whether the contribution is acceptable under the rule. For example, a contribution designated for the primary and made before that election will not be subject to the net debts outstanding rule, even if the campaign receives the contribution after the primary. By contrast, a contribution designated for—but made after—the primary is acceptable only to the extent the campaign has net debts outstanding for the primary on the date of receipt. 110.1(b)(3)(i) and (iii). See Section 8 of this chapter.

Date of Deposit

While all contributions must be deposited within 10 days, the date of deposit is not used for reporting or contribution limit purposes.

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. 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.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Maria Elvira Salazar for Congress:
 - A) Request for Additional Information for the Amended 2018 30 Day Post-General Report, dated December 23, 2018, referencing the missing 48-Hour Notices (sent via electronic mail to: etorgas@mbafcpa.com and aveciana@mbafcpa.com);
 - B) Reason-to-Believe Letter, dated March 25, 2019, referencing the missing 48-Hour Notices (sent via electronic mail to: etorgas@mbafcpa.com and aveciana@mbafcpa.com).
4. I hereby certify that I have searched the Commission’s public records and find that Maria Elvira Salazar for Congress has not yet filed the missing 48-Hour Notices with the Commission.
5. 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 6th day of August, 2019.

Kristin D. Roser

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 23, 2018

MR. SANTIAGO PUJALS, TREASURER
MARIA ELVIRA SALAZAR FOR CONGRESS
P.O. BOX 558033
MIAMI, FL 33255-8033

Response Due Date**01/28/2019**

IDENTIFICATION NUMBER: C00671859

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2018 -
11/26/2018), RECEIVED 12/11/2018

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. Your committee failed to file a Post-Election Detailed Summary Page. The Post-Election Detailed Summary Page must be used in lieu of the Detailed Summary Page and Lines 6-7 of the Summary Page for the report with coverage dates that include Election Day. The Post-Election Detailed Summary Page can be downloaded from the FEC web site (www.fec.gov). Please amend your report to include a Post-Election Detailed Summary Page. (11 CFR §§ 104.2(a) and 104.3)

2. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions (to include loans, in-kind contributions, and advances) received by your committee after the close of books for the 12 Day Pre-General Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

MARIA ELVIRA SALAZAR FOR CONGRESS

Page 2 of 3

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

3. It appears that your committee may have filed duplicate 48-hour notices. Your committee filed two 48-hour notices for each of the attached contributions; however, these contributions are only disclosed once on Schedule A of your report. Please amend your report to include the additional contributions or provide an explanation of the apparent discrepancies. (11 CFR §104.3(a)(4)(i))

4. On Schedule B supporting Line 17 of your report, you have itemized disbursements for which you have failed to include the address or purpose. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))

5. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the attached descriptions. For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement and a non-exhaustive list of acceptable purposes are available on the FEC website at <http://www.fec.gov/help-candidates-and-committees/purposes-disbursement/>.

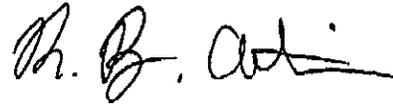
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1196.

MARIA ELVIRA SALAZAR FOR CONGRESS

Page 3 of 3

Sincerely,

A handwritten signature in black ink, appearing to read "B. Austin", with a long horizontal flourish extending to the right.

Bradley Austin
Senior Campaign Finance Analyst
Reports Analysis Division

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Missing 48-Hour Notices**Maria Elvira Salazar for Congress (C00671859)**

Contributor Name	Date	Amount	Election
Alexander, John	10/22/18	\$1,732.59	G2018
Alvarez, Amado Alan	10/30/18	\$1,000.00	G2018
Austin, Robert	10/22/18	\$2,700.00	G2018
Beauchamp, James B D	10/30/18	\$1,000.00	G2018
Burum, Jeffery S	10/30/18	\$2,000.00	G2018
Carr, James	10/30/18	\$2,700.00	G2018
Carr, Susan S	10/30/18	\$2,700.00	G2018
Coscolluela, Eugenio J.	10/30/18	\$1,000.00	G2018
Cosio, Alberto	10/30/18	\$1,000.00	G2018
Court, Jaime	10/24/18	\$1,732.60	G2018
Cruz, Clemente	10/30/18	\$2,700.00	G2018
Cruz, Teresa	10/30/18	\$2,700.00	G2018
De La Cruz, Claudia	10/30/18	\$1,000.00	G2018
Diaz, Manuel	10/30/18	\$2,500.00	G2018
Doddridge, William S	10/30/18	\$2,000.00	G2018
Dowd, Louise W	10/30/18	\$1,000.00	G2018
Fabar, Laura M	10/30/18	\$1,000.00	G2018
Feldenkreis, Oscar	10/30/18	\$2,000.00	G2018
Fidalgo, Edward	10/30/18	\$1,000.00	G2018
Finazzo, Julia R	10/30/18	\$2,700.00	G2018
Finazzo, Nick	10/30/18	\$2,700.00	G2018
Finazzo, Rose Ann	10/30/18	\$2,700.00	G2018
Foslid, Adam M	10/30/18	\$1,000.00	G2018
Hernandez, Yanet	10/30/18	\$1,000.00	G2018
Huck Jr., Paul C	10/30/18	\$1,000.00	G2018
Klepach, Bernard	10/30/18	\$1,000.00	G2018
Leon, Patrick A	10/30/18	\$1,000.00	G2018
Loeb, Daniel	10/30/18	\$2,700.00	G2018
Middelthon Jr, Willaim R	10/30/18	\$1,000.00	G2018
Miyares, Andria C	10/30/18	\$1,000.00	G2018
Moreno, Juan Carlos	10/30/18	\$1,000.00	G2018
Moskowitz, Michael	10/30/18	\$2,700.00	G2018
Nunberg, Jeffery S	10/30/18	\$2,700.00	G2018
Pasko, Mike	10/26/18	\$1,647.21	G2018
Perdomo-Cantero, Ana	10/30/18	\$1,000.00	G2018
Pinera-Vazquez, Silvia B	10/30/18	\$1,000.00	G2018
Prellezo, Esteban	10/30/18	\$1,000.00	G2018
Rowe, John W	10/30/18	\$2,700.00	G2018
Rudman, Frank	10/30/18	\$1,700.00	G2018

Missing 48-Hour Notices**Maria Elvira Salazar for Congress (C00671859)**

Contributor Name	Date	Amount	Election
Schnapp, Roberto	10/30/18	\$2,400.00	G2018
Slawson, Stephen	10/30/18	\$2,700.00	G2018
Turner, Salomon	10/30/18	\$1,000.00	G2018
Tovar, Rogelio	10/30/18	\$1,000.00	G2018
Trump, Julius	10/30/18	\$2,700.00	G2018
Vadia, Ricardo Juan	10/30/18	\$1,000.00	G2018
Villalon, Minet M	10/30/18	\$2,700.00	G2018
Villiams, James	10/30/18	\$2,500.00	G2018
Yates, Linda	10/30/18	\$2,700.00	G2018
Yates, Peyton	10/30/18	\$2,700.00	G2018
Altria Group, Inc Political Action Committee/ALTRIAPAC	10/30/18	\$2,500.00	G2018
Anthony Gonzalez For Congress	10/30/18	\$2,000.00	G2018
Bloomin' Brands, Inc. PAC	10/30/18	\$5,000.00	G2018
Buddy PAC	10/30/18	\$1,000.00	G2018
Impact Committee	10/30/18	\$1,000.00	G2018
Independent Insurance Agents & Brokers Of America, Inc. Politica Action Committee	10/30/18	\$2,500.00	G2018
IPHFHA Political Action Committee	10/30/18	\$2,000.00	G2018
Making America Prosperous PAC Kevin Grady, Chairman	10/30/18	\$2,000.00	G2018
Marathon Petroleum Corporation Employees Political Action Committee	10/30/18	\$1,000.00	G2018
Miami Association Of Fire Fighters Iaff Local 587 Pac	10/30/18	\$1,000.00	G2018
National Electrical Contractors Association PAC	10/30/18	\$2,500.00	G2018
Our Country Deserves Better Pact-Tea Party Express	10/30/18	\$1,000.00	G2018
Republican Party Of Miami Dade County Federal Account	10/30/18	\$1,000.00	G2018

**Incorrectly Reported Receipts on 48-Hour Notices
Maria Elvira Salazar for Congress (C00671859)**

Apparent Duplicate 48-Hour Notices Filed

Contributor Name	Date	Amount
Andreas, Alexander	10/22/18	\$2,700.00
Andreas, Denise	10/22/18	\$2,700.00
Blanford, Lawrence	10/22/18	\$1,000.00
Gamble, Kathryn	10/22/18	\$2,700.00
Kopp, Jay And Mary Pat	10/22/18	\$2,000.00
Mcquillan, Karin	10/22/18	\$1,000.00
Murgado Jr, Mario	10/22/18	\$2,700.00
Murgado, Bibiana	10/22/18	\$2,700.00
Murgado, Mario	10/22/18	\$2,700.00
Oasis, Russ	10/22/18	\$1,000.00
Vetter, Douglas	10/22/18	\$2,000.00
Build Our Future Pac	10/22/18	\$1,000.00
Business Industry Political Action Committee	10/22/18	\$1,000.00
Ice PAC	10/22/18	\$1,000.00
Texans For Jodey Arrington	10/22/18	\$1,000.00

Incorrectly Reported Disbursements
Maria Elvira Salazar for Congress (C00671859)

Inadequate Purposes

Name	Date	Amount	Purpose
Green Point Group	10/23/2018	\$2,175.00	2175.00
Fernandez, Ryan	11/7/2018	\$1,135.09	[Blank]
Enterprise Rent	11/19/2018	\$595.07	Auto
Green Point Group	11/13/2018	\$900.00	Collateral Material
Salgado, Iris	10/30/2018	\$30.11	Coordinator Services
Divinely Social	10/19/2018	\$2,500.00	Event - Election
Divinely Social	11/6/2018	\$1,426.00	Event - Election
Divinely Social	11/6/2018	\$1,250.00	Event - Election
Divinely Social	11/7/2018	\$1,250.00	Event - Election
Monster Sound Productions, Inc,	11/7/2018	\$4,972.50	Event - Election
Abrahantes, Marlen	11/12/2018	\$35,000.00	Fundraising
Mendez, Beatriz	11/9/2018	\$3,836.25	Fundraising
Mendez, Beatriz	11/23/2018	\$5,008.06	Fundraising
Pinto, Ivette	11/13/2018	\$3,816.50	Fundraising
Green Point Group	11/6/2018	\$5,895.00	Green Point Group
Green Point Group	11/13/2018	\$29,030.00	Green Point Group Invoices
Alexander, John	10/22/2018	\$1,732.59	In-kind -
Court, Jaime	10/24/2018	\$1,732.60	In-kind -
Pasko, Mike	10/26/2018	\$1,647.21	In-kind -

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 notifications disclosing contributions of \$1,000 or more which are received after the 20th day but more than 48 hours before an election. These notifications (also called 48-Hour Notices) must be filed with the Commission within 48 hours of the committee's receipt of the contribution(s).
- 3) 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) 48-Hour Notice filed by Maria Elvira Salazar for Congress and Santiago Pujals, in his official capacity as Treasurer, and received on October 31, 2018.
- 4) 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 16th day of August, 2019.

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

48-HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL MARIA ELVIRA SALAZAR FOR CONGRESS			
ADDRESS (number and street) P.O. Box 558033			
CITY Miami	STATE FL	ZIP CODE 33255-8033	
2. NAME OF CANDIDATE Salazar, Maria Elvira, , ,		3. OFFICE SOUGHT (State and District) House FL 27	4. FEC IDENTIFICATION NUMBER C00671859
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON 10 / 23 / 2018			
A. FULL NAME ANDREUS, ALEXANDER, , ,		Name of Employer BRICKELL MOTORS	Date (month, day, year) 10/22/2018
MAILING ADDRESS 5945 SW 29 STREET		Transaction ID : F6.8052	Amount 2700.00
CITY MIAMI	STATE FL	ZIP CODE 33155	Occupation COO
B. FULL NAME ANDREUS, DENISE, , ,		Name of Employer HOMEMAKER	Date (month, day, year) 10/22/2018
MAILING ADDRESS 5945 SW 29 STREET		Transaction ID : F6.8053	Amount 2700.00
CITY MIAMI	STATE FL	ZIP CODE 33155	Occupation HOMEMAKER
C. FULL NAME BLANFORD, LAWRENCE, , ,		Name of Employer RETIRED	Date (month, day, year) 10/22/2018
MAILING ADDRESS 7575 PELICAN BAY BLVD UNIT 1104		Transaction ID : F6.8054	Amount 1000.00
CITY NAPLES	STATE FL	ZIP CODE 34108	Occupation RETIRED
D. FULL NAME BUILD OUR FUTURE PAC		Name of Employer	Date (month, day, year) 10/22/2018
MAILING ADDRESS C/O 610 S BLVD		Transaction ID : F6.8055	Amount 1000.00
CITY TAMPA	STATE FL	ZIP CODE 33606	Occupation
E. FULL NAME BUSINESS INDUSTRY POLITICAL ACTION COMMITTEE		Name of Employer	Date (month, day, year) 10/22/2018
MAILING ADDRESS 1707 L STREET, NW		Transaction ID : F6.8057	Amount 1000.00
CITY WASHINGTON	STATE DC	ZIP CODE 20036	Occupation
SIGNATURE (optional) PUJALS, SANTIAGO, . Mr.,		DATE 10/23/2018	For further information contact: Federal Election Commission 999 E Street, NW, Washington, DC 20463 Toll Free 800-424-9530, Local 202-694-1100
[Electronically Filed]			

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Any information copied from reports and statements filed under the Federal Election Campaign Act may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

FEC FORM 6
(Revised 03/2016)

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL MARIA ELVIRA SALAZAR FOR CONGRESS			
ADDRESS (number and street) P.O. Box 558033			
CITY, STATE, and ZIP CODE Miami FL 33255-8033			
2. NAME OF CANDIDATE Salazar, Maria Elvira, , ,		3. OFFICE SOUGHT (State and District) House FL 27	4. FEC IDENTIFICATION NUMBER C00671859
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON 10 / 23 / 2018			
<i>continuation page</i>			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE GAMBLE, KATHRYN, , , 459 WEST BELDEN AVENUE CHICAGO IL 60614			
Name of Employer LINCOLN PARK ZOO Transaction ID : F6.8058		Date (month, day, year) 10/22/2018	Amount 2700.00
Occupation VETERINARIN			
B. FULL NAME, MAILING ADDRESS AND ZIP CODE KOPP, JAY AND MARY PAT, , , 2341 TECUMSEH DRIVE WEST PALM BEACH FL 33409			
Name of Employer RETIRED Transaction ID : F6.8060		Date (month, day, year) 10/22/2018	Amount 2000.00
Occupation RETIRED			
C. FULL NAME, MAILING ADDRESS AND ZIP CODE MCQUILLAN, KARIN, , , 1400 QUEENS LANE JACKSON WY 83001			
Name of Employer RETIRED Transaction ID : F6.8061		Date (month, day, year) 10/22/2018	Amount 1000.00
Occupation RETIRED			
D. FULL NAME, MAILING ADDRESS AND ZIP CODE MURGADO, BIBIANA, , , 665 SW 8 STREET MIAMI FL 33130			
Name of Employer RETIRED Transaction ID : F6.8062		Date (month, day, year) 10/22/2018	Amount 2700.00
Occupation RETIRED			
E. FULL NAME, MAILING ADDRESS AND ZIP CODE MURGADO, MARIO, , , 665 SW 8 STREET MIAMI FL 33130			
Name of Employer BRICEKLL MOTORS Transaction ID : F6.8063		Date (month, day, year) 10/22/2018	Amount 2700.00
Occupation CEO			

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL MARIA ELVIRA SALAZAR FOR CONGRESS			
ADDRESS (number and street) P.O. Box 558033			
CITY, STATE, and ZIP CODE Miami FL 33255-8033			
2. NAME OF CANDIDATE Salazar, Maria Elvira, , ,		3. OFFICE SOUGHT (State and District) House FL 27	4. FEC IDENTIFICATION NUMBER C00671859
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON 10 / 23 / 2018			
continuation page			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE			
MURGADO JR, MARIO, , , 10320 SW 88 AVENUE MIAMI FL 33176		Name of Employer BRICKELL MOTORS Transaction ID : F6.8064 Occupation GENERAL MANAGER	Date (month, day, year) 10/22/2018 Amount 2700.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE			
OASIS, RUSS, , , 4840 SW 80 ST MIAMI FL 33143		Name of Employer RETIRED Transaction ID : F6.8065 Occupation RETIRED	Date (month, day, year) 10/22/2018 Amount 1000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE			
VETTER, DOUGLAS, , , 401 HARRISON STREET UNIT 30B SAN FRANCISCO CA 94105		Name of Employer APPLE INC Transaction ID : F6.8067 Occupation ATTORNEY	Date (month, day, year) 10/22/2018 Amount 2000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE			
ICE PAC PO BOX 752 LONG LAKE MN 55356		Name of Employer Transaction ID : F6.8059 Occupation	Date (month, day, year) 10/22/2018 Amount 1000.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE			
TEXANS FOR JODEY ARRINGTON 228 S WASHINGTON ST STE 115 ALEXANDRIA VA 22314		Name of Employer Transaction ID : F6.8066 Occupation	Date (month, day, year) 10/22/2018 Amount 1000.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 20, 2019

Santiago Pujals, in official capacity as Treasurer
Maria Elvira Salazar for Congress
1450 Brickell Avenue, 18th Floor
Miami, FL 33131

C00671859
AF#: 3619

Dear Mr. Pujals:

On March 21, 2019, the Commission found reason to believe (“RTB”) that Maria Elvira Salazar for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file 48-Hour Notices for contributions totaling \$113,612.40 and made a preliminary determination that the civil money penalty was \$11,799 based on the schedule of penalties at 11 C.F.R. § 111.44.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination. 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, 1050 First Street, NE, 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 202-694-1158 if you have any questions.

Sincerely,

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review

MARIA ELVIRA SALAZAR FOR CONGRESS**Sent Via Facsimile Transmission
To 202-208-3333**

September 6, 2019

Commission Secretary
Federal Elections Commission
1050 First Street, NE
Washington, DC 20463

2019 SEP 10 AM 11:16

RE: Maria Elvira Salazar for Congress
Committee ID # C00671859
48-Hour Reporting Period (10/18/2018 to 11/3/2018)
AF#: 3619

The purpose of this letter is to appeal the decision of the Reviewing Officer, Rhiannon Magruder, on the above referenced matter on her letter dated August 20, 2019. We are appreciative of the opportunity to clarify the issues identified and we are hopeful that the Commission will waive the penalties or fines as a result of the same.

A. Introduction and Background.

The Campaign's intent and direction to its staff was to timely file all reports and report all contributions received. Unfortunately, a human error on the part of a filing clerk prevented the Campaign from filing the 48-Hour Report listing all contributions of \$1,000 or more received on October 30, 2018. More specifically, it appears that when selecting the report to upload, the clerk mistakenly selected the previously filed 10/23/18 48-Hour report and submitted it, as opposed to the 10/31/2018 report that was intended to be filed.

Separately, three in-kind contributions each exceeding \$1,000 were not reported on their respective 48-Hour Reports because the Campaign did not become aware of the existence of these in-kind contributions until long after the date the Commission felt those reports needed to be filed. Importantly, these three in-kind contributions were properly and timely reported on the Campaign's other reports after the Campaign learned of each in-kind contribution.

We respectfully request the Commission review the facts and circumstances surrounding these matters and waive any fines or penalties that could be assessed. There was never an intent to hide information from the public. The information that is subject to the penalty was not reported either due to inadvertent human error or, in the case of the in-kind distributions, because the Campaign had no knowledge of their existence at the

time the Reviewing Officer believes these contributions arguably should have been reported on a 48 Hour report.

II. Basis to Waive the Proposed Penalties.

a. **Failure to file 48-Hour report covering 63 reportable contributions totaling \$105,800 received on 10/30/18.**

Based on the Reviewing Officer's comments, it appears that the 48-Hour Report filed by the Campaign on 10/31/18 was mistakenly the same 48-Hour Report previously filed by the Campaign on 10/23/18. The Reviewing Officer states:

"In response to the Committee's statement that the Commission should have recognized that it was a duplicate filing, EFO explains:

The FEC Electronic Filing System does perform a check to prevent exact duplicate filing. The filing of 10/31/2018 included the date of 10/23/18 in the "Yes it amends the notice filed on" field, which was not included on the 10/23/18 filing. Therefore, the System did not consider the 10/31/2018 filing to be an exact duplicate of the 10/23/18 filing."

Indeed, the 28-Hour Report filed on 10/31/2018 states that it was an original filing. This exemplifies the fact that the filing clerk meant to file an original filing on said date instead of the duplicative report from the filing eight days earlier. There is an "X" in front of the statement "No, this is a new filing", and there is no "X" in front of the statement "Yes, it amends the notice filed on ...".

Question # 5 of the FEC Form 6; the filed form reads as follows:

"5. IS THIS AN AMENDMENT" NO THIS IS A NEW FILING. YES, IT AMENDS THE NOTICE FILED ON 10 / 23 / 2018."

The boxes checked and unchecked clearly indicate that the Campaign was trying to file an original report on 10/31/2018. Instead, the clerk mistakenly uploaded the same report that had been previously filed eight days earlier on 10/23/2018. Admittedly, the Campaign staff are not experts on the inner working of the Commission's software, and we still have no idea how the 10/23/2018 date ended on the report apparently filed in lieu of the report due on 10/31/18. In fact, our internal records did not have the 10/23/18 date on the filing submitted on 10/31/2018. Until receipt of the Commission letter dated March 25, 2019, we did not know that the information contained in the report filed on 10/31/2018 was identical to the filing of 10/23/18. Up until earlier this year, the Campaign did not receive a warning from the Commission that a duplicate report had (erroneously) been filed. Since the 10/31/2018 filing mistakenly included the data from the 10/23/2018 filing,

we had no means to determine some sort of action on our part was necessary to correct the files. This was purely a mistake on the part of the filing clerk on 10/31/2018.

The Reviewing Officer's report goes on to state: "Commission records indicate that Committee previously had technical difficulty filing 48-Hour Notices. Various Committee representatives sought assistance related to filing 48-hour Notices on multiple occasions..." Importantly, we have always attempted to fulfill the Campaign's filing requirements in a timely and transparent fashion. It was the Campaign's standing policy that, when in doubt, we would call the Commission and confirm the proper course of action before making a filing that subsequently could require an amendment. While we fully acknowledge the human error that occurred on 10/31/2018, the Campaign staff acted prudently and professionally to fulfill their duties and obligations. The fact that the staff sought assistance on other instances with filings highlights that the Campaign undertook a conscious effort to fulfill the Campaign's reporting obligations and was intending to meet all filing requirements and deadlines.

In conclusion, the Campaign does not dispute the 10/31/2018 48-Hour Report the Campaign intended to file did not make it to the Commission; however, this mistake did not occur because the Campaign was trying to keep information from the public. This filing mistake purely constituted an inadvertent human error and was not a premeditated act. Enclosed is an affidavit to that effect from Mr. Antonio Veciana the accounting clerk who submitted the wrong report.

We are hopeful that the Commission will waive any penalties or fines for this innocent mistake.

b. Three In-Kind Contributions.

The timeline shows that the three in-kind contributions in questions were not known to the Campaign at the time the Reviewing Officer states they should have been filed as part of a 48-Hour filing. In fact, the Campaign did not become aware of the subject three in-kind contributions until after the election. The below summary shows the important timeline for the Commission to consider for the subject in-kind contributions.

The Campaign contracted to hold a fundraising event at a local country club on October 24, 2018, with the intent that the related costs of \$3,645.19 would be paid by the Campaign. Unbeknown to the Campaign, two members of the country club, Mr. Alexander and Mr. Court decided they would pay for the cost of the event. The Campaign did not find out about their intent to pay for the event until November 6th. As stated in the Reviewing Officer's report, "The date of receipt for an in-kind contribution is the date the goods or services are provided to the committee ..."; since this event was held on October 24th, had the Campaign been aware of the eventual donors' intentions to pay for the event at that time, it would have had to report the contribution on a 48-Hour report which would

have had to be filed on August 25th. However, the Campaign did not become aware of the donors' intent to pay for the event until November 6th, and therefore, it was impossible for the Campaign to file the 48-Hour report with respect to the costs of this event until November 6, 2018, at the earliest.

Likewise, the in-kind contribution originally attributed to Mike Pasko (Campaign reports since amended to properly source the contribution to Speak Up America PAC) was not reported to the Campaign until November 19, 2018 by the PAC. Again, the Campaign gained knowledge of the contribution well after the expenditures aggregating \$1,647.21 were made by the PAC during the October 20 to October 26, 2018 time period.

We are hopeful the Commission will recognize the Campaign's inability to report these in-kind contributions on the dates the Reviewing Officer argues and will waive any penalties or fines related to them.

c. Robert Austin 10/22/18 contribution for \$2,700.

This contribution amount should have been included on the filing dated 10/23/2018. We admittedly erred and failed to properly report this contribution on the 10/23/18 48-Hour Report. This was an instance of human error and not an effort to deceive the public about the \$2,700 contribution.

III. Conclusion.

As additional information for the Commission's consideration, we have also enclosed copies of our Letter dated June 19, 2019, responding to the Commission's March 25, 2019 letter. Our letter dated June 19th contains documentation supporting our appeal. Finally, we have enclosed the Letter from Rhiannon Magruder dated August 20, 2019, recommending that the penalties originally computed be assessed.

In conclusion, we respectfully request that the Commission review the facts involved and waive the proposed penalties since:

1. The Campaign at all times tried to comply with all reporting requirements and, if any errors were made, they were just that, inadvertent human errors, not premeditated efforts to misinform or hide information from the public;
2. All Campaign funds were spent on the Campaign and the committee presently only has \$300 in its bank account and
3. We intend to close the Campaign once this matter is resolved.

We sincerely appreciate your consideration.

Yours truly,

A handwritten signature in black ink, appearing to read 'Santiago Pujals', written in a cursive style.

Santiago Pujals

Treasurer

Maria Elvira Salazar for Congress Campaign

1450 Brickell Avenue, 18th Floor

Miami, FL 33131

AFFIDAVIT OF ANTONIO VECIANA

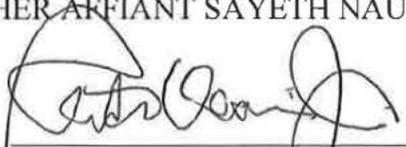
STATE OF FLORIDA:

COUNTY OF MIAMI-DADE:

BEFORE ME, the undersigned authority on this day personally appeared Mr. Antonio Veciana, who being by me first duly sworn did on his oath depose and say:

- a. My name is Antonio Veciana. I am over the age of eighteen (18) years. I submit this affidavit based on my own personal knowledge.
- b. From approximately June 5, 2018 to June 28, 2019, I performed accounting clerk and report filing services in connection with the 48-Hour Reports for Maria Elvira Salazar's Campaign for Congress ("the Campaign").
- c. The Campaign's intent and direction to its staff, including myself, was to timely file all reports and accurately report all contributions received.
- d. It was the Campaign's standing policy that, when in doubt, we would call the Commission and confirm the proper course of action before making a filing that subsequently could require an amendment.
- e. On or about October 31, 2018, I was provided a 48-Hour Report to file on behalf of the Campaign. This 48-Hour Report included all of the contributions received on October 30, 2018.
- f. On October 31, 2018, I uploaded a 48-Hour Report as part of my filing duties and I believed at the time that this report was the one dated October 31, 2018.
- g. As a result of a letter to the Campaign from the Commission dated March 25, 2019, we first learned that I made a mistake when uploading the 48-Hour Report on October 31, 2018. It appears that when selecting the report to upload on October 31st, I mistakenly selected the previously filed October 23, 2018 48-Hour report and submitted it, as opposed to the October 31, 2018 report that was intended to be filed.
- h. This was an innocent mistake on my part and it was not done to mislead anyone. I'm hopeful that the Campaign is not penalized or fined as a result of my filing mistake.

FURTHER AFFIANT SAYETH NAUGHT.



MR. ANTONIO VECLANA

SWORN TO AND SUBSCRIBED before me this 6th day of September 2019.


Neicha Martinez

NOTARY PUBLIC

My Commission Expires:

April 4, 2021

(Print, Type or Stamp Commissioned

Name of Notary Public

Personally known OR Produced Identification

Type of Identification Produced: _____



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

2019 NOV 26 PM 12: 23

SENSITIVE

November 26, 2019

MEMORANDUM

To: The Commission

Through: Alec Palmer *APM*
Staff Director *THAT*

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

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3619 – Maria Elvira Salazar for Congress and Santiago Pujals, in his official capacity as Treasurer (C00671859)

On March 21, 2019, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file a 48-Hour Notices for 63 contributions totaling \$113,612.40 and made a preliminary determination that the civil money penalty was \$11,799 based on the schedule of penalties at 11 C.F.R. § 111.44.

On June 20, 2019, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated August 16, 2019 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess an \$11,799 civil money penalty.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On September 30, 2019, the Commission received a response. *See* Attachment 1. The response reiterates and emphasizes the points made in the original challenge. The respondents acknowledge the Committee’s failure to file the required 48-Hour Notices but state, in part:

We respectfully request the Commission review the facts and circumstances surrounding these matters and waive any fines or penalties that could be assessed. There was never an intent to hide information from the public. The information that is subject to the penalty was not reported either due to inadvertent human error or, in the case of the in-kind distributions, because the Campaign had no knowledge of their existence at the time the Reviewing Officer believes these contributions arguably should have been reported on a 48-Hour report...

...[W]e respectfully request that the Commission review the facts involved and waive the proposed penalties since:

1. The Campaign at all times tried to comply with all reporting requirements and, if any errors were made, they were just that, inadvertent human errors, not premeditated efforts to misinform or hide information from the public;
2. All Campaign funds were spent on the Campaign and the committee presently only has \$300 in its bank account and
3. We intend to close the Campaign once this matter is resolved.

The Reviewing Officer's analysis and recommendations are unchanged. The challenge fails to adequately address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. 11 C.F.R. § 104.14(d). Failure to use filing software properly, inexperience, and negligence are specifically included at 11 C.F.R. § 111.35(d) as examples of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess an \$11,799 civil money penalty.

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 3619 involving Maria Elvira Salazar for Congress and Santiago Pujals, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3619 that Maria Elvira Salazar for Congress and Santiago Pujals, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess an \$11,799 civil money penalty; and
3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3619
 Final Determination Recommendation:)
 Maria Elvira Salazar for Congress and)
 Santiago Pujals, in his official capacity as)
 Treasurer (C00671859))

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 29, 2020, the Commission decided by a vote of 4-0 to take the following actions in AF 3619:

1. Adopt the Reviewing Officer recommendation for AF# 3619 involving Maria Elvira Salazar for Congress and Santiago Pujals, in his official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 3619 that Maria Elvira Salazar for Congress and Santiago Pujals, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess an \$11,799 civil money penalty.
3. 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
 18:35:21 -04'00'

 Laura E. Sinram
 Acting Secretary and Clerk of the
 Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 28, 2020

Santiago Pujals, in official capacity as Treasurer
Maria Elvira Salazar for Congress
1450 Brickell Avenue, 18th Floor
Miami, FL 33131

C00671859
AF#: 3619

Dear Mr. Pujals:

On March 21, 2019 the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Maria Elvira Salazar for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file 48-Hour Notices for contributions totaling \$113,612.40. By letter dated March 25, 2019, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$11,799 in accordance with the schedule of penalties at 11 C.F.R. § 111.44. On June 20, 2019, 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 make a final determination that Maria Elvira Salazar for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assess a civil money penalty in the amount of \$11,799 in accordance with 11 C.F.R. § 111.44. The Reviewing Officer Recommendation was sent to you on August 16, 2019.

On June 29, 2020, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Maria Elvira Salazar for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assessed a civil money penalty in the amount of \$11,799. A copy of the Final Determination Recommendation is attached.

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

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

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during

the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

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

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

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

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

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

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

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not

constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) 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 the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

A handwritten signature in black ink, reading "J.E. Trainor, III". The signature is written in a cursive style with a large, stylized initial "J" and "E".

James E. "Trey" Trainor III
Chair

Attachment

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.44, the amount of your civil money penalty calculated at final determination is \$11,799 for 48-Hour Notices.

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 to be directed to Pay.gov's Administrative Fine Program Payment form. Please use the details below to complete the required fields. For additional payment options, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1158.

COMMITTEE NAME: Maria Elvira Salazar for Congress

FEC ID#: C00671859

AF#: 3619

PAYMENT AMOUNT DUE: \$11,799

THIS IS THE END OF ADMINISTRATIVE FINE CASE #3619