

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #3809



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

June 22, 2020

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer AP by *KAH*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Withdrawal and Resubmission of Reason To Believe Recommendation –  
2020 April Quarterly Report for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on June 11, 2020 in order to reflect updates disclosed in filings received by the Commission after the initial submission of this recommendation. On June 17, 2020, Committee to Elect Mauro Garza for U.S. Congress (AF 3811) filed a 2020 April Quarterly Report. The circulation report has been updated to reflect this most recent filing.

Attached is a list of political committees and their treasurers who failed to file the 2020 April Quarterly Report in accordance with 52 U.S.C. § 30104(a). The April Quarterly Report was due on April 15, 2020.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

**Recommendation**

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

**Federal Election Commission**  
**Reason to Believe Circulation Report**  
**2020 APRIL QUARTERLY Not Election Sensitive 04/15/2020 H\_S\_P\_UNAUTH**

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3800	C00700534	ADRIENNE BELL FOR CONGRESS	ADRIENNE BELL	MIMI MONTGOMERY	\$180,159	0	5/15/2020	30	\$11,365	\$326
3801	C00698613	ALBERT CHESTER FOR CONGRESS	ALBERT CHESTER	ALBERT CHESTER	\$124,122	0	4/30/2020	15	\$52,846	\$2,087
3802	C00700476	ALBORS PARA COMISIONADO	JUAN CARLOS ALBORS	IGNACIO FERNANDEZ	\$145,698	0		Not Filed	\$48,566 (est)	\$1,230
3803	C00687657	AMERICAN PRO-ISRAEL PAC		JEANNE SULLIVAN	\$137,162	0		Not Filed	\$137,162 (est)	\$6,541
3804	C00438358	AMSTED INDUSTRIES INCORPORATED PAC		TRISTAN PAIGE LOPEZ	\$131,996	0		Not Filed	\$65,998 (est)	\$3,925
3805	C00204388	BI-COUNTY POLITICAL ACTION COMMITTEE		JEREMY S. KUPFERMAN	\$108,550	0	4/21/2020	6	\$10,000	\$182
3806	C00697862	CAMPAIGN TO SUPPORT THE PRESIDENT		MAUREEN OTIS	\$171,912	0		Not Filed	\$85,956 (est)	\$5,086
3807	C00257121	CITIZENS FOR RUSH	BOBBY LEE RUSH	SHEILA L. JACKSON	\$705,217	0	5/4/2020	19	\$137,417	\$4,329

3809	C00663104	COMMITTEE TO ELECT HP	HAMID PARVIZIAN	DOUNIA METOURI	\$106,911	2		Not Filed	\$106,911 (est)	\$9,811
3810	C00693176	COMMITTEE TO ELECT JOE WALZ	THADDEUS JOSEPH WALZ	ERIKA ANDREA WALZ	\$104,372	0		Not Filed	\$26,093 (est)	\$1,230
3811	C00663435	COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS	MAURO EVERETT GARZA	ELIZABETH IRIS CASTILLO	\$257,596	1	6/17/2020	*Not Filed	\$56,841	\$4,906
3812	C00452581	COPART INC POLITICAL ACTION COMMITTEE (COPART PAC)		JOE MEISTER	\$182,000	0		Not Filed	\$91,000 (est)	\$5,086
3813	C00728675	DR JAY FOR CONGRESS, INC.	JAY JALISI	JAMES C. THOMAS	\$180,067	0		Not Filed	\$180,067 (est)	\$7,994
3814	C00717025	EMILY ROBINSON FOR CONGRESS	EMILY ROBINSON	EMILY ROBINSON	\$240,480	0		Not Filed	\$120,240 (est)	\$6,541
3815	C00655084	FRIENDS OF MARC FRIEDENBERG	MARC FRIEDENBERG	SEAN MILLER	\$439,083	0		Not Filed	\$146,361 (est)	\$6,541
3816	C00691709	FRIENDS OF MICHAEL WEINSTOCK	MICHAEL S. WEINSTOCK	BRIAN DENKER-YOUNGS	\$132,965	0	4/30/2020	15	\$16,108	\$236
3818	C00717215	HOWARD STEELE FOR CONGRESS	HOWARD LYNN STEELE	ANDREA LESTER	\$136,184	0		Not Filed	\$68,092 (est)	\$3,925
3819	C00581199	JILL STEIN FOR PRESIDENT	JILL STEIN	STEVEN WELZER	\$282,534	14		Not Filed	\$70,634 (est)	\$17,662

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3820	C00710129	JON HOLLIS 4 CONGRESS	JON HOLLIS	JON HOLLIS	\$326,925	0		Not Filed	\$108,975 (est)	\$6,541
3821	C00677872	JONATHAN JENKINS FOR SENATE COMMITTEE	JONATHAN JENKINS	OFFICE OF TREASURER	\$1,049,103	0		Not Filed	\$1,049,103 (est)	\$17,440
3822	C00701508	JOSHUA COLLINS CAMPAIGN COMMITTEE	JOSHUA COLLINS	ANDY LO	\$358,495	0	4/24/2020	9	\$162,556	\$3,117

3824	C00708073	RONDA KENNEDY FOR CONGRESS 2020	RONDA KENNEDY	MICHAEL WARREN KENNEDY	\$100,363	0		Not Filed	\$33,454 (est)	\$1,230
3825	C00707596	SARAH GAD 2020	SARAH GAD	BENJAMIN NAWROCKI	\$185,899	0		Not Filed	\$92,950 (est)	\$5,086
3826	C00615013	SHAUN BROWN FOR VIRGINIA	SHAUN DENISE BROWN	OCTAVIANUS SMITH	\$179,167	0		Not Filed	\$179,167 (est)	\$7,994
3827	C00638148	SHIVA 4 SENATE	SHIVA AYYADURAI	CHRIS MARSTON	\$2,204,642	0	4/21/2020	6	\$2,100,927	\$9,007
3828	C00688069	SUPPORT AMERICAN LEADERS PAC		MAUREEN OTIS	\$956,586	0		Not Filed	\$239,147 (est)	\$9,446

3831	C00676320	UNITED FORWARD 2020 BENZEL FOR CONGRESS	JULIANNE ELIZABETH BENZEL	GREG DON BENZEL	\$202,857	0		Not Filed	\$40,571 (est)	\$1,230
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3833	C00616912	WOMEN VOTE SMART		AMY S. KREMER	\$291,231	0		Not Filed	\$145,616 (est)	\$6,541
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\* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)
	)
Withdrawal and Resubmission of Reason	)
To Believe Recommendation – 2020 April	)
Quarterly Report for the Administrative	)
Fine Program:	)
ADRIENNE BELL FOR CONGRESS, and	) AF# 3800
MIMI MONTGOMERY as treasurer;	)
ALBERT CHESTER FOR CONGRESS,	) AF# 3801
and CHESTER, ALBERT as treasurer;	)
ALBORS PARA COMISIONADO, and	) AF# 3802
FERNANDEZ, IGNACIO as treasurer;	)
AMERICAN PRO-ISRAEL PAC, and	) AF# 3803
SULLIVAN, JEANNE as treasurer;	)
AMSTED INDUSTRIES	) AF# 3804
INCORPORATED PAC, and LOPEZ,	)
TRISTAN PAIGE as treasurer;	)
BI-COUNTY POLITICAL ACTION	) AF# 3805
COMMITTEE, and KUPFERMAN,	)
JEREMY S as treasurer;	)
CAMPAIGN TO SUPPORT THE	) AF# 3806
PRESIDENT, and OTIS, MAUREEN as	)
treasurer;	)
CITIZENS FOR RUSH, and JACKSON,	) AF# 3807
SHEILA L. as treasurer;	)
COMMITTEE TO ELECT HP, and	) AF# 3809
METOURI, DOUNIA as treasurer;	)
COMMITTEE TO ELECT JOE WALZ,	) AF# 3810
and WALZ, ERIKA ANDREA as treasurer;	)
COPART INC POLITICAL ACTION	) AF# 3812
COMMITTEE (COPART PAC), and	)
MEISTER, JOE as treasurer;	)
DR JAY FOR CONGRESS, INC., and	) AF# 3813
THOMAS, JAMES C as treasurer;	)
EMILY ROBINSON FOR CONGRESS,	AF# 3814
and ROBINSON, EMILY as treasurer;	
FRIENDS OF MARC FRIEDENBERG,	) AF# 3815
and MILLER, SEAN MR. as treasurer;	)

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FRIENDS OF MICHAEL WEINSTOCK, and DENKER-YOUNGS, BRIAN as treasurer;	) AF# 3816
HOWARD STEELE FOR CONGRESS, and LESTER, ANDREA as treasurer;	) AF# 3818
JILL STEIN FOR PRESIDENT, and WELZER, STEVEN as treasurer;	AF# 3819
JON HOLLIS 4 CONGRESS, and HOLLIS, JON as treasurer;	) AF# 3820
JOSHUA COLLINS CAMPAIGN COMMITTEE, and LO, ANDY as treasurer;	) AF# 3822
RONDA KENNEDY FOR CONGRESS 2020, and KENNEDY, MICHAEL WARREN as treasurer;	) AF# 3824
SARAH GAD 2020, and NAWROCKI, BENJAMIN as treasurer;	) AF# 3825
SHAUN BROWN FOR VIRGINIA, and SMITH, OCTAVIANUS as treasurer;	) AF# 3826
SHIVA 4 SENATE, and MARSTON, CHRIS as treasurer;	) AF# 3827
SUPPORT AMERICAN LEADERS PAC, and OTIS, MAUREEN as treasurer;	) AF# 3828
UNITED FORWARD 2020 BENZEL FOR CONGRESS, and BENZEL, GREG DON MR. as treasurer;	) AF# 3831
WOMEN VOTE SMART, and KREMER, AMY S as treasurer;	) AF# 3833

**CERTIFICATION**

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 30, 2020 the Commission took the following actions on the Withdrawal and Resubmission of Reason To Believe Recommendation – 2020 April Quarterly Report for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated June 22, 2020, on the following committees:

AF#3800 Decided by a vote of 4-0 to: (1) find reason to believe that ADRIENNE BELL FOR CONGRESS, and MIMI MONTGOMERY in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3801 Decided by a vote of 4-0 to: (1) find reason to believe that ALBERT CHESTER FOR CONGRESS, and CHESTER, ALBERT in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3802 Decided by a vote of 4-0 to: (1) find reason to believe that ALBORS PARA COMISIONADO, and FERNANDEZ, IGNACIO in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3803 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICAN PRO-ISRAEL PAC, and SULLIVAN, JEANNE in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3804 Decided by a vote of 4-0 to: (1) find reason to believe that AMSTED INDUSTRIES INCORPORATED PAC, and LOPEZ, TRISTAN PAIGE in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3805 Decided by a vote of 4-0 to: (1) find reason to believe that BI-COUNTY POLITICAL ACTION COMMITTEE, and KUPFERMAN, JEREMY S in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3806 Decided by a vote of 4-0 to: (1) find reason to believe that CAMPAIGN TO SUPPORT THE PRESIDENT, and OTIS, MAUREEN in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3807 Decided by a vote of 4-0 to: (1) find reason to believe that CITIZENS FOR RUSH, and JACKSON, SHEILA L. in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3809 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT HP, and METOURI, DOUNIA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3810 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT JOE WALZ, and WALZ, ERIKA ANDREA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the

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

AF#3812 Decided by a vote of 4-0 to: (1) find reason to believe that COPART INC POLITICAL ACTION COMMITTEE (COPART PAC), and MEISTER, JOE in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3813 Decided by a vote of 4-0 to: (1) find reason to believe that DR JAY FOR CONGRESS, INC., and THOMAS, JAMES C in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3814 Decided by a vote of 4-0 to: (1) find reason to believe that EMILY ROBINSON FOR CONGRESS, and ROBINSON, EMILY in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3815 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF MARC FRIEDENBERG, and MILLER, SEAN MR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3816 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF MICHAEL WEINSTOCK, and DENKER-YOUNGS, BRIAN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3818 Decided by a vote of 4-0 to: (1) find reason to believe that HOWARD STEELE FOR CONGRESS, and LESTER, ANDREA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3819 Decided by a vote of 4-0 to: (1) find reason to believe that JILL STEIN FOR PRESIDENT, and WELZER, STEVEN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3820 Decided by a vote of 4-0 to: (1) find reason to believe that JON HOLLIS 4 CONGRESS, and HOLLIS, JON in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3822 Decided by a vote of 4-0 to: (1) find reason to believe that JOSHUA COLLINS CAMPAIGN COMMITTEE, and LO, ANDY in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3824 Decided by a vote of 4-0 to: (1) find reason to believe that RONDA KENNEDY FOR CONGRESS 2020, and KENNEDY, MICHAEL WARREN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3825 Decided by a vote of 4-0 to: (1) find reason to believe that SARAH GAD 2020, and NAWROCKI, BENJAMIN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3826 Decided by a vote of 4-0 to: (1) find reason to believe that SHAUN BROWN FOR VIRGINIA, and SMITH, OCTAVIANUS in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the

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

AF#3827 Decided by a vote of 4-0 to: (1) find reason to believe that SHIVA 4 SENATE, and MARSTON, CHRIS in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3828 Decided by a vote of 4-0 to: (1) find reason to believe that SUPPORT AMERICAN LEADERS PAC, and OTIS, MAUREEN in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3831 Decided by a vote of 4-0 to: (1) find reason to believe that UNITED FORWARD 2020 BENZEL FOR CONGRESS, and BENZEL, GREG DON MR.in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3833 Decided by a vote of 4-0 to: (1) find reason to believe that WOMEN VOTE SMART, and KREMER, AMY S in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.



Attest:

**Laura  
Sinram**

Laura E. Sinram

Acting Secretary and Clerk of the  
Commission

Digitally signed by  
Laura Sinram  
Date: 2020.07.08  
15:11:28 -04'00'



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

July 15, 2020

Dounia Metouri, in official capacity as Treasurer  
Committee to Elect HP  
P.O. Box 924916  
Houston, TX 77292

**Response Due Date**

**08/09/2020**

C00663104  
AF#: 3809

Dear Ms. Metouri,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an April Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period January 1, 2020 through March 31, 2020, shall be filed no later than April 15, 2020. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On June 30, 2020, the FEC found that there is reason to believe ("RTB") that Committee to Elect HP and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before April 15, 2020. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$9,811. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <https://www.fec.gov/af/pay.shtml> 11 CFR § 111.34. Your payment of \$9,811 is due within forty (40) days of the finding, or by August 9, 2020, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$106,911  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 2

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**

## COMMITTEE TO ELECT HP

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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. 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 August 9, 2020. 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).

Please note, on June 18, 2020, the Federal Election Commission began the initial phase (Phase I) of its return to normal operations. At this stage, the agency's offices will remain closed to visitors and most of its employees will continue to telework in an effort to limit the spread of coronavirus (COVID-19). The Commission is processing some documents submitted by mail, though processing will not occur on a daily basis until the agency resumes normal mail operations. Nevertheless, a challenge to an RTB finding and/or calculated civil money penalty must be received on time. Thus, all written responses and supporting documentation should be converted to PDF (Portable Document Format) and must be emailed to [administrativefines@fec.gov](mailto:administrativefines@fec.gov). The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the date it is electronically received by staff.

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

## COMMITTEE TO ELECT HP

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service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

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

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

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Committee to Elect HP and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

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

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

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

**5. Settlement Offers**

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

## COMMITTEE TO ELECT HP

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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 <https://www.fec.gov/af/pay.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly 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.

Sincerely,



James E. "Trey" Trainor III  
Chair

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#### ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$9,811 for the April Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](https://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

COMMITTEE TO ELECT HP

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fields. For additional payment options, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

COMMITTEE NAME: Committee to Elect HP

FEC ID#: C00663104

AF#: 3809

PAYMENT DUE DATE: August 9, 2020

PAYMENT AMOUNT DUE: \$9,811

**RECEIVED***By Office of the Commission Secretary at 8:26 am, Nov 24, 2020*

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

November 23, 2020

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the 2020 April Quarterly Report

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2020 April Quarterly Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

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

For your information, six (6) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Albors para Comisionado (AF 3802) filed the 2020 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money

penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$8 (previously estimated to be \$48,566), thus the fine would be lowered from \$1,230 to \$8.

Committee to Elect Joe Walz (AF 3810) filed the 2020 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$27 (previously estimated to be \$26,093), thus the fine would be lowered from \$1,230 to \$27.

Copart Inc. Political Action Committee (Copart PAC) (AF 3812) filed the 2020 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$21,500 (previously estimated to be \$91,000), thus the fine would be lowered from \$5,086 to \$684. The committee paid the civil money penalty assessed at RTB; we will therefore issue a refund for the difference (\$4,402).

Friends of Marc Friedenberg (AF 3815) disclosed no activity after the RTB finding (previously estimated to be \$146,361), which would result in no civil money penalty (fine previously assessed to be \$6,541).

Jill Stein for President (AF 3819) filed the 2020 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$9,227 (previously estimated to be \$70,634), thus the fine would be lowered from \$17,662 to \$1,845.

Jon Hollis 4 Congress (AF 3820) disclosed no activity after the RTB finding (previously estimated to be \$108,975), which would result in no civil money penalty (fine previously assessed to be \$6,541).

For your information, five (5) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

Campaign to Support the President (AF 3806) filed an Amended Statement of Organization after the RTB finding designating Matt Tunstall as Treasurer.

Citizens for Rush (AF 3807) filed an Amended Statement of Organization after the RTB finding designating Janet Szydelko as Treasurer.

Friends of Marc Friedenberg (AF 3815) filed an Amended Statement of Organization after the RTB finding designating Margaret Swoboda as Treasurer.

Joshua Collins Campaign Committee (AF 3822) filed an Amended Statement of Organization after the RTB finding designating Joshua Collins as Treasurer.

Support American Leaders PAC (AF 3828) filed an Amended Statement of Organization after the RTB finding designating Matthew Nelson Tunstall as Treasurer.

**RAD Recommendation**

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

Federal Election Commission  
FD Circulation Report Fine Paid  
2020 APRIL QUARTERLY Not Election Sensitive 04/15/2020 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
3800	ADRIENNE BELL FOR CONGRESS	ADRIENNE BELL	C00700534	MIMI MONTGOMERY	05/15/2020	30	\$22,136	0	06/30/2020	\$326	\$326	08/10/2020	\$326
3805	BI-COUNTY POLITICAL ACTION COMMITTEE		C00204388	JEREMY S. KUPFERMAN	04/21/2020	6	\$10,000	0	06/30/2020	\$182	\$182	07/24/2020	\$182
3807	CITIZENS FOR RUSH	BOBBY LEE RUSH	C00257121	JANET SZYDELKO	05/04/2020	19	\$147,393	0	06/30/2020	\$4,329	\$4,329	09/09/2020	\$4,329
3812	COPART INC POLITICAL ACTION COMMITTEE (COPART PAC)		C00452581	JOE MEISTER	06/30/2020	Not Filed*	\$21,500	0	06/30/2020	\$5,086	\$684	08/10/2020	\$5,086**
3824	RONDA KENNEDY FOR CONGRESS 2020	RONDA KENNEDY	C00708073	MICHAEL WARREN KENNEDY	07/06/2020	Not Filed*	\$79,053	0	06/30/2020	\$1,230	\$1,230	08/10/2020	\$1,230

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

\*\* This committee disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty and will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. This committee paid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference.

**Federal Election Commission**  
**FD Circulation Report Fine Not Paid**  
**2020 APRIL QUARTERLY Not Election Sensitive 04/15/2020 H\_S\_P\_UNAUTH**

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
3801	ALBERT CHESTER FOR CONGRESS	ALBERT CHESTER	C00698613	ALBERT CHESTER	04/30/2020	15	\$52,846	0	06/30/2020	\$2,087	191	\$2,087
3802	ALBORS PARA COMISIONADO	JUAN CARLOS ALBORS	C00700476	IGNACIO FERNANDEZ	07/28/2020	Not Filed*	\$8	0	06/30/2020	\$1,230	191	\$8
3803	AMERICAN PRO-ISRAEL PAC		C00687657	JEANNE SULLIVAN		Not Filed	\$137,162 (est)	0	06/30/2020	\$6,541	191	\$6,541
3804	AMSTED INDUSTRIES INCORPORATED PAC		C00438358	TRISTAN PAIGE LOPEZ	10/12/2020	Not Filed*	\$54,901	0	06/30/2020	\$3,925	191	\$3,925
3806	CAMPAIGN TO SUPPORT THE PRESIDENT		C00697862	MATT TUNSTALL	12/16/2020	Not Filed*	\$135,633	0	06/30/2020	\$5,086	191	\$5,086
3809	COMMITTEE TO ELECT HP	HAMID PARVIZIAN	C00663104	DOUNIA METOURI		Not Filed	\$106,911 (est)	2	06/30/2020	\$9,811	191	\$9,811
3810	COMMITTEE TO ELECT JOE WALZ	THADDEUS JOSEPH WALZ	C00693176	ERIKA ANDREA WALZ	09/15/2020	Not Filed*	\$27	0	06/30/2020	\$1,230	191	\$27
3811	COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS	MAURO EVERETT GARZA	C00663435	ELIZABETH IRIS CASTILLO	06/17/2020	Not Filed*	\$56,841	1	06/30/2020	\$4,906	191	\$4,906
3813	DR JAY FOR CONGRESS, INC.	JAY JALISI	C00728675	JAMES C. THOMAS		Not Filed	\$180,067 (est)	0	06/30/2020	\$7,994	191	\$7,994
3814	EMILY ROBINSON FOR CONGRESS	EMILY ROBINSON	C00717025	EMILY ROBINSON		Not Filed	\$120,240 (est)	0	06/30/2020	\$6,541	191	\$6,541
3815	FRIENDS OF MARC FRIEDENBERG	MARC FRIEDENBERG	C00655084	MARGARET SWOBODA	07/14/2020	Not Filed*	\$0	0	06/30/2020	\$6,541	191	NONE
3818	HOWARD STEELE FOR CONGRESS	HOWARD LYNN STEELE	C00717215	ANDREA LESTER		Not Filed	\$68,092 (est)	0	06/30/2020	\$3,925	191	\$3,925
3819	JILL STEIN FOR PRESIDENT	JILL STEIN	C00581199	STEVEN WELZER	09/27/2020	Not Filed*	\$9,227	14	06/30/2020	\$17,662	191	\$1,845
3820	JON HOLLIS 4 CONGRESS	JON HOLLIS	C00710129	JON HOLLIS	09/07/2020	Not Filed*	\$0	0	06/30/2020	\$6,541	191	NONE
3821	JONATHAN JENKINS FOR SENATE COMMITTEE	JONATHAN JENKINS	C00677872	OFFICE OF TREASURER		Not Filed	\$1,049,103 (est)	0	06/30/2020	\$17,440	191	\$17,440
3822	JOSHUA COLLINS CAMPAIGN COMMITTEE	JOSHUA COLLINS	C00701508	JOSHUA COLLINS	04/24/2020	9	\$162,556	0	06/30/2020	\$3,117	191	\$3,117
3825	SARAH GAD 2020	SARAH GAD	C00707596	BENJAMIN NAWROCKI		Not Filed	\$92,950 (est)	0	06/30/2020	\$5,086	191	\$5,086
3828	SUPPORT AMERICAN LEADERS PAC		C00688069	MATTHEW NELSON TUNSTALL	11/24/2020	Not Filed*	\$1,026,204	0	06/30/2020	\$9,446	191	\$9,446
3833	WOMEN VOTE SMART		C00616912	AMY S. KREMER		Not Filed	\$145,616 (est)	0	06/30/2020	\$6,541	191	\$6,541

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

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)
	)
Administrative Fine Program - Final	)
Determination Recommendation for the	)
2020 April Quarterly Report:	)
ADRIENNE BELL FOR CONGRESS, and	) AF# 3800
MONTGOMERY, MIMI as treasurer;	)
ALBERT CHESTER FOR CONGRESS,	) AF# 3801
and CHESTER, ALBERT as treasurer;	)
ALBORS PARA COMISIONADO, and	) AF# 3802
FERNANDEZ, IGNACIO as treasurer;	)
AMERICAN PRO-ISRAEL PAC, and	) AF# 3803
SULLIVAN, JEANNE as treasurer;	)
AMSTED INDUSTRIES	) AF# 3804
INCORPORATED PAC, and LOPEZ,	)
TRISTAN PAIGE as treasurer;	)
BI-COUNTY POLITICAL ACTION	) AF# 3805
COMMITTEE, and KUPFERMAN,	)
JEREMY S as treasurer;	)
CAMPAIGN TO SUPPORT THE	) AF# 3806
PRESIDENT, and TUNSTALL, MATT as	)
treasurer;	)
CITIZENS FOR RUSH, and SZYDELKO,	) AF# 3807
JANET as treasurer;	)
COMMITTEE TO ELECT HP, and	) AF# 3809
METOURI, DOUNIA as treasurer;	)
COMMITTEE TO ELECT JOE WALZ,	) AF# 3810
and WALZ, ERIKA ANDREA as treasurer;	)
COMMITTEE TO ELECT MAURO	) AF# 3811
GARZA FOR US CONGRESS, and	)
CASTILLO, IRIS ELIZABETH MS. as	)
treasurer;	)
COPART INC POLITICAL ACTION	) AF# 3812
COMMITTEE (COPART PAC), and	)
MEISTER, JOE as treasurer;	)
DR JAY FOR CONGRESS, INC., and	) AF# 3813
THOMAS, JAMES C as treasurer;	)

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EMILY ROBINSON FOR CONGRESS, and ROBINSON, EMILY as treasurer;	AF# 3814
FRIENDS OF MARC FRIEDENBERG, and SWOBODA, MARGARET MRS. as treasurer;	) AF# 3815
HOWARD STEELE FOR CONGRESS, and LESTER, ANDREA as treasurer;	)
JILL STEIN FOR PRESIDENT, and WELZER, STEVEN as treasurer;	) AF# 3818
JON HOLLIS 4 CONGRESS, and HOLLIS, JON as treasurer;	) AF# 3819
JONATHAN JENKINS FOR SENATE COMMITTEE, and OFFICE OF TREASURER;	) AF# 3820
JOSHUA COLLINS CAMPAIGN COMMITTEE, and COLLINS, JOSHUA as treasurer;	) AF# 3821
RONDA KENNEDY FOR CONGRESS 2020, and KENNEDY, MICHAEL WARREN as treasurer;	) AF# 3822
SARAH GAD 2020, and NAWROCKI, BENJAMIN as treasurer;	) AF# 3824
SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON as treasurer;	) AF# 3825
WOMEN VOTE SMART, and KREMER, AMY S as treasurer;	) AF# 3828
	)
	) AF# 3833
	)

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AMENDED CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 07, 2021, the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation for the 2020 April Quarterly Report, as recommended in the Reports Analysis Division's Memorandum dated November 23, 2020, on the following committees:

AF#3800 Decided by a vote of 6-0 to: (1) make a final determination that ADRIENNE BELL FOR CONGRESS, and MONTGOMERY, MIMI in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3801 Decided by a vote of 6-0 to: (1) make a final determination that ALBERT CHESTER FOR CONGRESS, and CHESTER, ALBERT in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3802 Decided by a vote of 6-0 to: (1) make a final determination that ALBORS PARA COMISIONADO, and FERNANDEZ, IGNACIO in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3803 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN PRO-ISRAEL PAC, and SULLIVAN, JEANNE in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3804 Decided by a vote of 6-0 to: (1) make a final determination that AMSTED INDUSTRIES INCORPORATED PAC, and LOPEZ, TRISTAN PAIGE in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3805 Decided by a vote of 6-0 to: (1) make a final determination that BI-COUNTY POLITICAL ACTION COMMITTEE, and KUPFERMAN, JEREMY S in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3806 Decided by a vote of 6-0 to: (1) make a final determination that CAMPAIGN TO SUPPORT THE PRESIDENT, and TUNSTALL, MATT in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3807 Decided by a vote of 6-0 to: (1) make a final determination that CITIZENS FOR RUSH, and SZYDELKO, JANET in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3809 Decided by a vote of 6-0 to: (1) make a final determination that COMMITTEE TO ELECT HP, and METOURI, DOUNIA in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3810 Decided by a vote of 6-0 to: (1) make a final determination that COMMITTEE TO ELECT JOE WALZ, and WALZ, ERIKA ANDREA as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3811 Decided by a vote of 6-0 to: (1) make a final determination that COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS, and CASTILLO, IRIS ELIZABETH MS. in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3812 Decided by a vote of 6-0 to: (1) make a final determination that COPART INC POLITICAL ACTION COMMITTEE (COPART PAC), and MEISTER, JOE in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3813 Decided by a vote of 6-0 to: (1) make a final determination that DR JAY FOR CONGRESS, INC., and THOMAS, JAMES C in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3814 Decided by a vote of 6-0 to: (1) make a final determination that EMILY ROBINSON FOR CONGRESS, and ROBINSON, EMILY in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3815 Decided by a vote of 6-0 to: (1) make a final determination that FRIENDS OF MARC FRIEDENBERG, and SWOBODA, MARGARET MRS. in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3818 Decided by a vote of 6-0 to: (1) make a final determination that HOWARD STEELE FOR CONGRESS, and LESTER, ANDREA in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3819 Decided by a vote of 6-0 to: (1) make a final determination that JILL STEIN FOR PRESIDENT, and WELZER, STEVEN in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3820 Decided by a vote of 6-0 to: (1) make a final determination that JON HOLLIS 4 CONGRESS, and HOLLIS, JON in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3821 Decided by a vote of 6-0 to: (1) make a final determination that JONATHAN JENKINS FOR SENATE COMMITTEE, and OFFICE OF TREASURER, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3822 Decided by a vote of 6-0 to: (1) make a final determination that JOSHUA COLLINS CAMPAIGN COMMITTEE, and COLLINS, JOSHUA in his official capacity

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

AF#3824 Decided by a vote of 6-0 to: (1) make a final determination that RONDA KENNEDY FOR CONGRESS 2020, and KENNEDY, MICHAEL WARREN in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3825 Decided by a vote of 6-0 to: (1) make a final determination that SARAH GAD 2020, and NAWROCKI, BENJAMIN in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3828 Decided by a vote of 6-0 to: (1) make a final determination that SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3833 Decided by a vote of 6-0 to: (1) make a final determination that WOMEN VOTE SMART, and KREMER, AMY S in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.



February 17, 2021

Date

Attest:

Laura Sinram

Digitally signed by Laura  
 Sinram  
 Date: 2021.02.17  
 12:35:14 -05'00'

Laura E. Sinram

Acting Secretary and Clerk of the  
 Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

February 18, 2021

Dounia Metouri, in official capacity as Treasurer  
Committee to Elect HP  
P.O. Box 924916  
Houston, TX 77292

C00663104  
AF#: 3809

Dear Ms. Metouri,

On June 30, 2020, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Committee to Elect HP and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2020 April Quarterly Report. By letter dated July 15, 2020, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$9,811 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, you, as treasurer, were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty. You must also file the April Quarterly Report if you have not already done so.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The FEC made a final determination on January 7, 2021 that Committee to Elect HP 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 \$9,811 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$106,911  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 2

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 thirty (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

## COMMITTEE TO ELECT HP

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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 thirty (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 five (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

## COMMITTEE TO ELECT HP

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your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

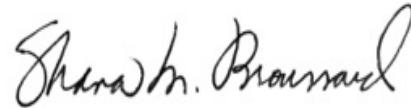
### 5. Settlement Offers

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 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Ben Holly at Federal Election Commission, 1050 First St., NE, Washington, DC 20002, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

On behalf of the Commission,



Shana M. Broussard  
Chair

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### ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$9,811 for the 2020 April Quarterly Report. The payment is due within 30 days of receipt of this letter.

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

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fields. For additional payment options, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

COMMITTEE NAME: Committee to Elect HP

FEC ID#: C00663104

AF#: 3809

PAYMENT AMOUNT DUE: \$9,811

THIS IS THE END OF ADMINISTRATIVE FINE CASE #3809