



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 7, 2021

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: Withdrawal and Resubmission of Reason To Believe Recommendation –
2020 October Quarterly Report (Non-Election Sensitive) for the
Administrative Fine Program

We are withdrawing the document circulated to the Commission on December 11, 2020 in order to reflect updates disclosed in filings received by the Commission after the initial submission of this recommendation. An overview of these updates has been provided below.

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

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

An explanation of the civil money penalty calculation for a committee that failed to timely file the report is outlined below:

Friends of Bob Olsen 4 Congress (AF 3971) was required to file a 2020 October Quarterly Report (Q3) covering July 16, 2020 through September 30, 2020 (77 days). On November 16, 2020, the committee filed a 2020 October Quarterly Report covering July 1, 2020 through September 30, 2020 (92 days). We utilized a three-step method to arrive at the activity on which to base the Q3 fine amount. First, we took the sum of all itemized receipts and disbursements that were disclosed during the required filing dates. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 83.70% (77 days (Committee's Q3 Filing Period)/92 days (Regular Q3 Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the Q3.

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 OCTOBER QUARTERLY Not Election Sensitive 10/15/2020 H_S_P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
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3962	C00735910	CARMELITA FOR CONGRESS	CARMELITA GRECO	VAL TILLSTROM	\$1,173,234	0	12/1/2020	Not Filed*	\$404,700	\$13,311
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3971	C00715748	FRIENDS OF BOB OLSEN 4 CONGRESS	ROBERT OLSEN	LINDA OLSEN	\$130,755	0	11/16/2020	Not Filed*	\$504 (est)	\$347
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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)
October Quarterly Report (Non-Election)
Sensitive) for the Administrative Fine)
Program:)

CARMELITA FOR CONGRESS, and) AF# 3962
TILLSTROM, VAL as treasurer;)

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FRIENDS OF BOB OLSEN 4)	AF# 3971
CONGRESS, and OLSEN, LINDA as)	
treasurer;)	

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CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 08, 2021, the Commission took the following actions on the Withdrawal and Resubmission of Reason To Believe Recommendation - 2020 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated January 07, 2021, on the following committees:

AF#3962 Decided by a vote of 6-0 to: (1) find reason to believe that CARMELITA FOR CONGRESS, and TILLSTROM, VAL 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3971 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF BOB OLSEN 4 CONGRESS, and OLSEN, LINDA 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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Attest:

**Laura
Sinram**

Laura E. Sinram
Acting Secretary and Clerk of the
Commission

Digitally signed by
Laura Sinram
Date: 2021.02.03
18:51:31 -05'00'



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AF

February 8, 2021

Val Tillstrom, in official capacity as Treasurer
Carmelita for Congress
P.O. Box 1058
Novi, MI 48376-1058

C00735910
AF#: 3962

Dear Ms. Tillstrom,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an October Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period July 16, 2020 through September 30, 2020, shall be filed no later than October 15, 2020. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty.

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 January 8, 2021, the FEC found that there is reason to believe ("RTB") that Carmelita for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before October 15, 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 \$13,311. 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 \$13,311 is due within forty (40) days of the finding, or by February 17, 2021, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$404,700

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purpose of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 0

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

CARMELITA FOR CONGRESS

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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. 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 February 17, 2021. 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 daily 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. 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). 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

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

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

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

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

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

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

3. If You Choose to Pay the Civil Money Penalty

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

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

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

5. Settlement Offers

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

CARMELITA FOR CONGRESS

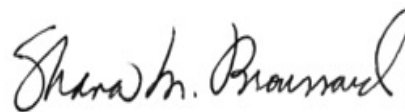
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correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be 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 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,



Shana M. Broussard
Chair

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 \$13,311 for the October Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml 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 Jamie Sikorsky in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

COMMITTEE NAME: Carmelita for Congress

FEC ID#: C00735910

AF#: 3962

PAYMENT DUE DATE: February 17, 2021

PAYMENT AMOUNT DUE: \$13,311

Valerie L Tillstrom
vaultcampaigns@gmail.com

TO: FEC Administrative Fines Department

FROM: Valerie Tillstrom, Treasurer Carmelita for Congress

RE: Carmelita for Congress FEC ID#: C00735910 AF#: 3962

DATE: March 19, 2021

Please allow this in response to the FEC notice sent to Carmelita for Congress February 8, 2021 regarding the Committee's 2020 October Quarterly report.

I would respectfully like to request the commission's consideration of an ADR to hear this matter as reasonably unforeseen circumstances prevented the timely filing of the October 2020 report.

Additionally, the Carmelita for Congress committee has been made aware of similar new candidate committee's repeated failing to file in a timely manner, which were notified by the FEC and allowed 4 days to file the missing reports. The Carmelita for Congress committee was not provided such notification and similar provisions.

Thank you for your consideration.

Respectfully,
Valerie L. Tillstrom

Valerie L Tillstrom
vaultcampaigns@gmail.com

TO: FEC Administrative Fines Department

FROM: Valerie Tillstrom, Treasurer Carmelita for Congress

RE: Carmelita for Congress FEC ID#: C00735910 AF#: 3962

DATE: March 24, 2021

Please allow this as a follow-up to my March 19th correspondence response to the FEC notice sent to Carmelita for Congress February 8, 2021 regarding the Committee's 2020 October Quarterly report.

The report was not timely filed due to the sudden hospice notice of my mother's impending passing. As we all had been quarantined from our loved ones during the past year, we were finally being allowed to be with her during this time. I immediately left town and unfortunately had still not received the necessary report materials from the no longer active Carmelita for Congress campaign before doing so. After a week of hospice, my mother did pass where we remained to plan & hold services, clear out her living facility and wrap up her affairs. Upon returning to my home, I was naturally swamped with work catch-up. Since the Carmelita for Congress campaign was no longer active, due to the candidate's loss in the Michigan August 4th primary election, it was no longer on my radar and I forgot to return to the October 2020 quarterly filing. On November 26th, 2020 (Thanksgiving Day) I received an electronic reminder from the FEC that the report was missing. With this reminder, I immediately returned to the report during the holiday and subsequently filed the missing 3rd Quarter report on December 1st, 2020, two business days after receiving the email.

As noted above, since the candidate lost in the August 4th primary election, the first time candidate did not consider the urgency of report information following the lost election. In my previous correspondence, I noted that similar new candidate committees, as well as experienced committees, repeatedly failed to file reports in a timely manner, were notified by the FEC and allowed 4 business days to file the missing reports. This was the first instance of a missed report by Carmelita for Congress committee, but no such notification and similar allowances were provided to the Carmelita for Congress committee.

Additionally, the committee is being fined for money received from the candidate; \$100,000 prior to the primary election and \$52,000 afterward to settle campaign debts incurred during the primary election. By comparison, very little outside monies (\$44,235) were received by this campaign, which I believe is the intent of the public reporting to provide what outside interests are funding a campaign. Fines were

also calculated on expenses, of which \$275,000 debt expenses were previously reported on the Pre-Primary Report.

Accordingly, based on the circumstances of this matter, we respectfully request the elimination or drastic reduction in the proposed fine amount.

Thank you for your request of this further information. I look forward to discussing a resolution to this matter.

Respectfully,
Valerie L. Tillstrom



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 2021

REVIEWING OFFICER RECOMMENDATION OFFICE OF ADMINISTRATIVE REVIEW (“OAR”)

AF# 3962 – Carmelita for Congress and Val Tillstrom, in her official capacity as Treasurer (C00735910)

Summary of Recommendation

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$13,311 civil money penalty.

Reason-to-Believe Background

The 2020 October Quarterly Report was due on October 15, 2020. The respondents filed the report on December 1, 2020, 47 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On January 8, 2021, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 October Quarterly Report and made a preliminary determination that the civil money penalty was \$13,311 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was emailed to the respondents’ email address of record from the Reports Analysis Division (“RAD”) on February 8, 2021 to notify them of the Commission’s RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act (“Act”) states that the treasurer of a principal campaign committee shall file a report for the quarter ending September 30 no later than October 15. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(a)(1)(i). 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 March 26, 2021, the Commission received the written response (“challenge”) from the Treasurer requesting that the Commission either waive or drastically reduce the penalty. The Treasurer notes that the first-time Candidate lost the 2020 Primary Election, and the campaign subsequently became inactive. Further, she had not yet received the necessary campaign records at the time she became aware of a family emergency requiring her to leave town. The Treasurer further explains:

After a week of hospice, my mother did pass where we remained to plan & hold services, clear out her living facility and wrap up her affairs. Upon returning to my home, I was naturally swamped with work catch-up. Since the Carmelita for Congress campaign was no longer active, due to the candidate’s loss, it was no longer on my radar and I forgot to return to the October 2020 quarterly filing.

The Treasurer states that she received a notification on November 26, 2020 regarding the late report. Two business days later, on December 1, 2020, the Committee filed the report. The Treasurer references other committees that “were notified by the FEC and allowed 4 business days to file the missing reports” but states the Committee was not provided the same notification or allowances for its first offense. The Treasurer concludes by noting the campaign was largely funded by the Candidate, and the fine was calculated based on funds received from the Candidate and expenses to pay debts which were previously reported.

Analysis

The respondents indicate the 2020 October Quarterly Report was not timely filed because the Treasurer had difficulty obtaining the necessary Committee records, and she was unexpectedly unavailable due to a family health emergency.¹ Further, the Treasurer acknowledges that upon returning home, campaign business was not a priority because the campaign was inactive, and she forgot to file the report. After receiving a notification from the Commission, the Committee filed the 2020 October Quarterly Report on December 1, 2020, 47 days late.

The Reviewing Officer recognizes the campaign may have disbanded after the 2020 Primary Election, and the Treasurer had difficulty in obtaining Committee records. However, a committee’s filing obligation ends only when a committee files a termination report, and the Commission notifies them in writing that their termination report has been accepted. 11 C.F.R. § 102.3; *Campaign Guide for Congressional Candidates and Committees*, 79. Further, while the Reviewing Officer is sympathetic to the Treasurer’s personal circumstances, a committee’s treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d). Moreover, unavailability of a committee’s treasurer/staff and negligence are both included at 11 C.F.R. § 111.35(d) as examples of a circumstances that will not be considered reasonably unforeseen and beyond the respondents’ control.

¹ The respondents did not provide any details to indicate the dates the Treasurer was unavailable.

The respondents also indicate they were not reminded of the missing report until November 26, 2020, upon receiving notification from the Commission.² However, Commission records indicate otherwise. The Committee was reminded of the 2020 October Quarterly reporting requirement on multiple occasions prior to the filing deadline. On September 30, 2020, the Commission's Information Division sent an email reminder concerning the 2020 October Quarterly Report to vaultcampaigns@gmail.com, the email address listed on the Committee's Statement of Organization. Then on October 13, 2020, the Commission's Electronic Filing Office ("EFO") sent a reminder email regarding the 2020 October Quarterly Report. EFO sent the notification to vaultcampaigns@gmail.com and valtillstrom@gmail.com, the email addresses listed on the Committee's Statement of Organization and used to upload electronic reports. On October 16, 2020, the day following the deadline, EFO sent a late notification email to the same email addresses because the report had not yet been filed. Based on these notifications, the respondents should have been reminded of the 2020 October Quarterly Report filing requirement, both prior to and immediately following the October 15, 2020 due date.

The respondents also contend they were not provided the same notification which allows some committees to file the missing report within four business days. According to RAD, the respondents are referring to the Commission's procedures for citing authorized committees of candidates which are participating in an upcoming election but did not timely file a report for the calendar quarter immediately preceding the election. Those committees that do not timely file such reports are sent notification that their report has not been received, and "...if a satisfactory response is not received within four (4) business days, the Commission shall publish before the election the name of the person and the report or reports such person has failed to file." 11 C.F.R. § 111.8(c). The Reviewing Officer notes that because the Candidate did not participate in the 2020 General Election, the Committee was not subject to publication for failure to file the 2020 October Quarterly Report and therefore, did not receive such notice. The Reviewing Officer also confirms RAD sent the appropriate non-filer notification to the Committee on November 26, 2020. Moreover, non-filer notifications state, in part:

The failure to timely file this report may result in civil money penalties, an audit or other legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report.

Finally, the respondents state that the proposed fine was calculated using funds the Candidate contributed to the committee and expenses for debts which were previously disclosed. For the purpose of calculating the civil money penalty, the level of activity for an authorized committee is the total amount of receipts and disbursements for the period covered by the late report. 11 C.F.R. § 111.43(d)(3)(i). The Reviewing Officer confirms that funds from the Candidate and disbursements to pay debts should be included in the level of activity. The 2020 October Quarterly Report discloses \$199,202 in total receipts and \$205,498 in total disbursements during the reporting period. Therefore, the level of activity of the 2020 October Quarterly Report is \$404,700. 11 C.F.R. § 111.43(d)(3)(i). Using the schedule of penalties at 11 C.F.R § 111.43(a), the Reviewing Officer confirms the penalty of \$13,311 calculated at RTB is correct.

² Commission records indicate the respondents are referring to RAD's non-filer notification sent on 11/26/20 to vaultcampaigns@gmail.com, the email address listed on the Committee's Statement of Organization.

The Reviewing Officer is sympathetic to the Treasurer's circumstances. However, the challenge fails to 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. A committee's history of compliance is also not considered when determining if a violation occurred. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$13,311 civil money penalty.

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 3962 involving Carmelita for Congress and Val Tillstrom, in her official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3962 that Carmelita for Congress and Val Tillstrom, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$13,311 civil money penalty; and
3. Send the appropriate letter.

Attachments

Attachment 1 –
Attachment 2 –
Attachment 3 –
Attachment 4 –
Attachment 5 –
Attachment 6 – Declaration from RAD
Attachment 7 – Declaration from OAR

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. 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 Carmelita for Congress:
 - A) Non-Filer Letter, dated November 26, 2020, referencing the 2020 October Quarterly Report (sent via electronic mail to: vaultcampaigns@gmail.com);
 - B) Reason-to-Believe Letter, dated February 8, 2021, referencing the 2020 October Quarterly Report (sent via electronic mail to: vaultcampaigns@gmail.com).
4. I hereby certify that I have searched the Commission's public records and find that Carmelita for Congress filed the 2020 October Quarterly Report with the Commission on December 1, 2020.
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 on the 26th day of April, 2021.

Kristin D. Roser

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

November 26, 2020

TILLSTROM, VAL, TREASURER
CARMELITA FOR CONGRESS
PO BOX 1058
NOVI, MI 48376-1058

IDENTIFICATION NUMBER: C00735910

REFERENCE: OCTOBER QUARTERLY REPORT (7/16/2020 - 9/30/2020)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately. The report must be filed with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. 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. Reports sent by registered mail, overnight delivery, or certified mail, are considered filed with the FEC as of the date of the postmark. Reports submitted by first-class mail will be considered filed when actually received by Commission staff, subject to delays resulting from the agency's limited mail processing. The Commission will not be able to receive, or process reports filed by courier service during Phase I. The FEC does not have statutory authority to extend filing deadlines, but it may choose not to pursue administrative fines against filers prevented from filing by reasonably unforeseen circumstances beyond their control. If you have already filed the report by express, certified or registered mail, please notify us immediately of the certified, registered or express tracking number and the date that the report was sent.

Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

CARMELITA FOR CONGRESS

Page 2 of 2

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report.

If you have any questions regarding this matter, please contact Chris Ritchie in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1146).

Sincerely,

A handwritten signature in black ink that reads "Debbie Chacona". The script is cursive and fluid.

Deborah Chacona
Assistant Staff Director
Reports Analysis Division

250

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) A principal campaign committee of a candidate shall file a report for the period ending September 30 no later than October 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time October 15, 2020 for the 2020 October Quarterly Report to be timely filed.
- 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) Cover, Summary, and Detailed Summary Pages of the 2020 October Quarterly Report filed by Carmelita for Congress. The report includes the coverage period of July 16, 2020 through September 30, 2020 and was electronically filed on December 1, 2020.
- 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 on the 20th day of May, 2021.

Rhiannon Magruder

Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

**FEC
FORM 3****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

Carmelita for Congress

ADDRESS (number and street)

PO Box 1058



Check if different than previously reported. (ACC)

Novi

MI

48376-1058

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

C C00735910

3. IS THIS REPORT



NEW (N)

OR



AMENDED (A)

STATE ▼ DISTRICT

MI

11

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:



April 15 Quarterly Report (Q1)



July 15 Quarterly Report (Q2)



October 15 Quarterly Report (Q3)



January 31 Year-End Report (YE)



Termination Report (TER)

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



Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

M M / D D / Y Y Y Y

in the State of

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



General (30G)



Runoff (30R)



Special (30S)

Election on

M M / D D / Y Y Y Y

in the State of

5. Covering Period

M M / D D / Y Y Y Y

07 / 16 / 2020

through

M M / D D / Y Y Y Y

09 / 30 / 2020

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

Type or Print Name of Treasurer

Tillstrom, Val, , ,

Signature of Treasurer

Tillstrom, Val, , ,

[Electronically Filed]

Date

M M / D D / Y Y Y Y

12 / 01 / 2020

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.

Office
Use
Only**FEC FORM 3**
(Revised 05/2016)

SUMMARY PAGE

of Receipts and Disbursements

FEC Form 3 (Revised 05/2016)

PAGE 2 / 37

Write or Type Committee Name
Carmelita for Congress

Report Covering the Period:

From:

M M / D D / Y Y Y Y
07 16 2020

To:

M M / D D / Y Y Y Y
09 30 2020

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	44235.38	164833.15
(b) Total Contribution Refunds (from Line 20(d))	10.00	10.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	44225.38	164823.15
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	205488.28	578423.96
(b) Total Offsets to Operating Expenditures (from Line 14)	0.00	0.00
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))	205488.28	578423.96
8. Cash on Hand at Close of Reporting Period (from Line 27)	16366.36	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	427000.00	

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3 (Revised 05/2016)

PAGE 3 / 37

Write or Type Committee Name

Carmelita for Congress

Report Covering the Period:

From:

M	M	/	D	D	/	Y	-	Y	-	Y	-	Y
0	7		1	6		2	0	2	0			

To:

M	M	/	D	D	/	Y	-	Y	-	Y	-	Y
0	9		3	0		2	0	2	0			

I. RECEIPTS
COLUMN A
Total This Period

COLUMN B
Election Cycle-to-Date
11. CONTRIBUTIONS (other than loans) FROM:**(a) Individuals/Persons Other Than Political Committees****(i) Itemized (use Schedule A)**

12485.00

45610.00

(ii) Unitemized

31750.38

99587.31

(iii) TOTAL of contributions from individuals

44235.38

145197.31

(b) Political Party Committees

0.00

0.00

(c) Other Political Committees (such as PACs)

0.00

0.00

(d) The Candidate

0.00

19635.84

(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c), and (d))..

44235.38

164833.15

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

0.00

0.00

13. LOANS:**(a) Made or Guaranteed by the Candidate**

152000.00

427000.00

(b) All Other Loans

0.00

0.00

(c) TOTAL LOANS (add Lines 13(a) and (b))

152000.00

427000.00

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

0.00

0.00

15. OTHER RECEIPTS (Dividends, Interest, etc.)

2967.17

2967.17

16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)

199202.55

594800.32

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3 (Revised 05/2016)

PAGE 4 / 37

II. DISBURSEMENTS**COLUMN A**
Total This Period**COLUMN B**
Election Cycle-to-Date

17. OPERATING EXPENDITURES.....

205488.28

578423.96

18. TRANSFERS TO OTHER
AUTHORIZED COMMITTEES

0.00

0.00

19. LOAN REPAYMENTS:

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

0.00

0.00

(b) Of All Other Loans

0.00

0.00

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

0.00

0.00

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other
Than Political Committees

10.00

10.00

(b) Political Party Committees.....

0.00

0.00

(c) Other Political Committees
(such as PACs)

0.00

0.00

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

10.00

10.00

21. OTHER DISBURSEMENTS

0.00

0.00

22. TOTAL DISBURSEMENTS

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

205498.28

578433.96

III. CASH SUMMARY

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

22662.09

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

199202.55

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

221864.64

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

205498.28

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

16366.36



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 2021

Val Tillstrom, in official capacity as Treasurer
Carmelita for Congress
27845 Milan Ct.
Northville, MI 48167

C00735910
AF# 3962

Dear Ms. Tillstrom:

On January 8, 2021, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Carmelita for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2020 October Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$13,311 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess a civil money penalty. 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. Please note, the agency’s offices 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, if you choose to submit a response to the recommendation, it 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 the Commission Secretary at secretary@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 responses will be deemed received on the date it is electronically received by staff. 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

Valerie L Tillstrom
vaultcampaigns@gmail.com

TO: FEC Secretary

CC: Rhiannon Magruder, Reviewing Officer, Office of Administrative Review

FROM: Valerie Tillstrom, Treasurer Carmelita for Congress

RE: Carmelita for Congress FEC ID#: C00735910 AF#: 3962

DATE: May 30, 2021

Pursuant to Reviewing Officer Rhiannon Magruder's correspondence of May 20, 2021, I would like to submit this correspondence for the Commission's consideration.

Per Officer Magruder's review, I agree that adequate pre-notification was provided to the above candidate committee for the October 2020 3rd Quarter filing deadline and even without, as Treasurer I am well aware of the filing deadlines. The late filing was due to my personal circumstances, as previously submitted, that coincided with the filing date. I questioned the notification process given to committees after the filing deadline that did not file timely and were allowed an additional four days to file without publication. I now understand that type of notice is only provided to committees that are in an active election process, not candidates that are no longer running for office.

I would respectfully like to ask the commission's consideration of a reduction to the fine assessed given my personal circumstances and that the Carmelita for Congress Committee did provide the FEC and the Public notification of over half of the of 3rd Qtr. receipts prior to the 2020 3rd Quarter report due date (48 hour reports filed to and received by the FEC total \$102,600) as previously noted.

Per the Commission's own publications, I understand the commission has the broad authority to consider the above request:

"Further Commission action against non-filers and late filers is decided on a case-by-case basis. Federal law gives the FEC broad authority to initiate enforcement actions, and the FEC has implemented an Administrative Fine program with provisions for assessing monetary penalties."

This is a first time candidate committee, that has filed timely prior to and since the October 2020 3rd Quarter report and additionally was no longer participating in the election process due to the August 2020 Michigan primary election loss.

Thank you for your consideration.

Respectfully,

Valerie Tillstrom, Treasurer
Carmelita for Congress



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

July 28, 2021

MEMORANDUM

To: The Commission

Through: Alec Palmer *AP*
Staff Director

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

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3962 – Carmelita for Congress and Val Tillstrom, in her official capacity as Treasurer (C00735910)

On January 8, 2021, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 October Quarterly Report and made a preliminary determination that the civil money penalty was \$13,311 based on the schedule of penalties at 11 C.F.R. § 111.43.

On March 26, 2021, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated May 20, 2021 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. While sympathetic to the Treasurer’s personal circumstances, the Reviewing Officer noted that a committee’s treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d). Moreover, unavailability of a committee’s treasurer/staff and negligence are both included at 11 C.F.R. § 111.35(d) as examples of a circumstances that will not be considered reasonably unforeseen and beyond the respondents’ control. The Reviewing officer also confirmed the Commission appropriately notified and reminded the Committee of its requirement to file the 2020 October Quarterly Report. Finally, the Reviewing Officer confirmed the calculation of the civil money penalty at RTB was correct. Therefore, the Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$13,311 civil money penalty.

Within 10 days of transmittal of the recommendation, the respondents 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 June 1, 2021, the Commission received their response. *See* Attachment 1. The Treasurer notes she now understands the Commission's non-filer notification process. She again requests the Commission's consideration to reduce the penalty given her personal circumstances and the Committee's timely disclosure of over half of the 2020 October Quarterly receipts in previously filed 48-Hour Notices. The Treasurer also reiterates the Committee's prior compliance and inactive status after losing the 2020 Primary Election.

The information received in the Committee's response does not change the analysis or recommendations in the ROR. The Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$13,311.

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 3962 involving Carmelita for Congress and Val Tillstrom, in her official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3962 that Carmelita for Congress and Val Tillstrom, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$13,311 civil money penalty; and
3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3962
 Final Determination Recommendation:)
 Carmelita for Congress and Val)
 Tillstrom, in her official capacity as)
 Treasurer (C00735910))

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on August 04, 2021, the Commission decided by a vote of 5-1 to take the following actions in AF 3962:

1. Adopt the Reviewing Officer recommendation for AF# 3962 involving Carmelita for Congress and Val Tillstrom, in her official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 3962 that Carmelita for Congress and Val Tillstrom, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$13,311 civil money penalty.
3. Send the appropriate letter.

Commissioners Broussard, Cooksey, Dickerson, Trainor, and Walther voted affirmatively for the decision. Commissioner Weintraub dissented.



Attest:

**Laura
Sinram**

Laura E. Sinram
 Acting Secretary and Clerk of the
 Commission

Digitally signed by
 Laura Sinram
 Date: 2021.08.06
 16:35:17 -04'00'



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 11, 2021

Val Tillstrom, in official capacity as Treasurer
Carmelita for Congress
27845 Milan Ct.
Northville, MI 48167

C00735910
AF# 3962

Dear Ms. Tillstrom:

On January 8, 2021, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Carmelita for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2020 October Quarterly Report. By letter dated February 8, 2021, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$13,311 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On March 26, 2021, 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 Carmelita 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 \$13,311 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on May 20, 2021.

On August 4, 2021, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Carmelita 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 \$13,311. 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, appearing to read "Shana M. Broussard". The signature is fluid and cursive, with the first name "Shana" and last name "Broussard" clearly distinguishable.

Shana M. Broussard
Chair

Attachment

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 final determination is \$13,311 for the 2020 October Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml 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) 694-1660.

COMMITTEE NAME: Carmelita for Congress

FEC ID#: C00735910

AF#: 3962

PAYMENT AMOUNT DUE: \$13,311