SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 2022

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer AP
Staff Director

FROM: Patricia C. Orrock PCO
Chief Compliance Officer

Debbie Chacona DC
Assistant Staff Director
Reports Analysis Division

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

SUBJECT: Reason To Believe Recommendation – 2021 Year-End Report for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2021 Year-End Report in accordance with 52 U.S.C. § 30104(a). The Year-End Report was due on January 31, 2022.

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.

3/15/2022 7:53 AM

Federal Election Commission
Reason to Believe Circulation Report
2021 YEAR-END Not Election Sensitive 01/31/2022 H_S_P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4265	C00348540	1199 SERVICE EMPLOYEES INT'L UNION FEDERAL POLITICAL ACTION FUND		HELEN SCHAUB	$10,723,827	0	2/9/2022	9	$5,551,417	$10,801
4266	C00719070	AJA SMITH FOR CONGRESS 2022	AJA SMITH	AJA SMITH	$234,984	0		Not Filed	$78,328 (est)	$5,563
4267	C00197103	AUTOMOBILE CLUB OF MICHIGAN POLITICAL ACTION COMMITTEE		KEVIN GAWRONSKI	$307,354	0	2/14/2022	14	$160,210	$4,606
4268	C00723270	BRAD BARRON FOR US SENATE	STEPHEN BRADLEY BARRON	JILL M. BARRON	$128,788	6		Not Filed	$128,788 (est)	$17,885
4270	C00717025	EMILY ROBINSON FOR CONGRESS	EMILY ROBINSON	EMILY ROBINSON	$120,240	8		Not Filed	$120,240 (est)	$21,462
4272	C00763995	FRIENDS OF BARBARA SHARIEF FOR CONGRESS	BARBARA SHARIEF	SUZETTE SPALDING	$1,591,756	0		Not Filed	$530,585 (est)	$15,101
4273	C00736736	GEORGE MITRIS FOR CONGRESS	GEORGE MITRIS	THOMAS COSTA	$145,106	5		Not Filed	$145,106 (est)	$16,096
4274	C00765347	GREG LIRETTE FOR CONGRESS	GREGORY LIRETTE	KEVIN KITCHEN	$144,587	2		Not Filed	$144,587 (est)	$10,731
4275	C00732875	JIMMY RODRIGUEZ FOR CONGRESS	JIMMY RODRIGUEZ	JIMMY RODRIGUEZ	$614,521	6		Not Filed	$614,521 (est)	$39,742
4276	C00766642	MATT BERG FOR CONGRESS	MATTHEW RICHARD BERG	GERALD D. GUNN	$232,836	0		Not Filed	$77,612 (est)	$5,563
4277	C00749069	OUR BLACK PARTY		BETTY CRICHLOW-EBERHARDT	$155,353	0	2/7/2022	7	$52,088	$1,318
4278	C00776518	PEOPLE FOR ELVIN DOWLING	ELVIN DOWLING	ELVIN DOWLING	$159,623	0		Not Filed	$53,208 (est)	$4,292
4280	C00729624	REBA FOR CONGRESS	REBA SHERRILL	BRYON FREDRICK MCCOMB	$400,168	5		Not Filed	$400,168 (est)	$32,188

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4282	C00522458	TOGETHER WE THRIVE		CHRISTOPHER ZULLO	$104,451	3		Not Filed	$104,451 (est)	$12,519
4283	C00002840	UAW - V - CAP (UAW VOLUNTARY COMMUNITY ACTION PROGRAM) 'INT'L UNION UNITED AUTOMOBILE AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA UAW		FRANK STUGLIN	$10,253,004	1	2/11/2022	11	$5,670,144	$14,293
4284	C00616912	WOMEN VOTE SMART		AMY S. KREMER	$145,616	5		Not Filed	$145,616 (est)	$16,096

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reason To Believe Recommendation - 2021	)	
Year-End Report for the Administrative	)	
Fine Program:	)	
1199 SERVICE EMPLOYEES INT'L	)	AF# 4265
UNION FEDERAL POLITICAL ACTION	)	
FUND, and SCHAUB, HELEN as	)	
treasurer;	)	
AJA SMITH FOR CONGRESS 2022, and	)	AF# 4266
SMITH, AJA as treasurer;	)	
AUTOMOBILE CLUB OF MICHIGAN	)	AF# 4267
POLITICAL ACTION COMMITTEE, and	)	
GAWRONSKI, KEVIN as treasurer;	)	
BRAD BARRON FOR US SENATE, and	)	AF# 4268
BARRON, JILL M as treasurer;	)	
EMILY ROBINSON FOR CONGRESS,	)	AF# 4270
and ROBINSON, EMILY as treasurer;	)	
FRIENDS OF BARBARA SHARIEF FOR	)	AF# 4272
CONGRESS, and SPALDING, SUZETTE	)	
as treasurer;	)	
GEORGE MITRIS FOR CONGRESS, and	)	AF# 4273
COSTA, THOMAS as treasurer;	)	
GREG LIRETTE FOR CONGRESS, and	)	AF# 4274
KITCHEN, KEVIN as treasurer;	)	
JIMMY RODRIGUEZ FOR CONGRESS,	)	AF# 4275
and RODRIGUEZ, JIMMY as treasurer;	)	
MATT BERG FOR CONGRESS, and	)	AF# 4276
GUNN, GERALD D as treasurer;	)	
OUR BLACK PARTY, and CRICHLOW-	)	AF# 4277
EBERHARDT, BETTY as treasurer;	)	
PEOPLE FOR ELVIN DOWLING, and	)	AF# 4278
DOWLING, ELVIN as treasurer;	)	
REBA FOR CONGRESS, and MCCOMB,	)	AF# 4280
BRYON FREDRICK as treasurer;	)	

TOGETHER WE THRIVE, and CHRISTOPHER ZULLO as treasurer;	)	AF# 4282
UAW - V - CAP (UAW VOLUNTARY COMMUNITY ACTION PROGRAM) 'INT'L UNION UNITED AUTOMOBILE AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA UAW, and STUGLIN, FRANK as treasurer;	)	AF# 4283
WOMEN VOTE SMART, and KREMER, AMY S as treasurer;	)	AF# 4284

CERTIFICATION

I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on March 16, 2022 the Commission took the following actions on the Reason To Believe Recommendation - 2021 Year-End Report for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated March 15, 2022, on the following committees:

AF#4265 Decided by a vote of 6-0 to: (1) find reason to believe that 1199 SERVICE EMPLOYEES INT'L UNION FEDERAL POLITICAL ACTION FUND, and SCHAUB, HELEN in their 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.

AF#4266 Decided by a vote of 6-0 to: (1) find reason to believe that AJA SMITH FOR CONGRESS 2022, and SMITH, AJA in their 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.

AF#4267 Decided by a vote of 6-0 to: (1) find reason to believe that AUTOMOBILE CLUB OF MICHIGAN POLITICAL ACTION COMMITTEE, and GAWRONSKI, KEVIN in their 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.

AF#4268 Decided by a vote of 6-0 to: (1) find reason to believe that BRAD BARRON FOR US SENATE, and BARRON, JILL M in their 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.

AF#4270 Decided by a vote of 6-0 to: (1) find reason to believe that EMILY ROBINSON FOR CONGRESS, and ROBINSON, EMILY in their 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.

AF#4272 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF BARBARA SHARIEF FOR CONGRESS, and SPALDING, SUZETTE in their 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.

AF#4273 Decided by a vote of 6-0 to: (1) find reason to believe that GEORGE MITRIS FOR CONGRESS, and COSTA, THOMAS in their 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.

AF#4274 Decided by a vote of 6-0 to: (1) find reason to believe that GREG LIRETTE FOR CONGRESS, and KITCHEN, KEVIN in their 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.

AF#4275 Decided by a vote of 6-0 to: (1) find reason to believe that JIMMY RODRIGUEZ FOR CONGRESS, and RODRIGUEZ, JIMMY in their 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.

AF#4276 Decided by a vote of 6-0 to: (1) find reason to believe that MATT BERG FOR CONGRESS, and GUNN, GERALD D in their 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.

AF#4277 Decided by a vote of 6-0 to: (1) find reason to believe that OUR BLACK PARTY, and CRICHLOW-EBERHARDT, BETTY in their 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.

AF#4278 Decided by a vote of 6-0 to: (1) find reason to believe that PEOPLE FOR ELVIN DOWLING, and DOWLING, ELVIN in their 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.

AF#4280 Decided by a vote of 6-0 to: (1) find reason to believe that REBA FOR CONGRESS, and MCCOMB, BRYON FREDRICK in their 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.

AF#4282 Decided by a vote of 6-0 to: (1) find reason to believe that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO in their 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.

AF#4283 Decided by a vote of 6-0 to: (1) find reason to believe that UAW - V - CAP (UAW VOLUNTARY COMMUNITY ACTION PROGRAM) 'INT'L UNION UNITED AUTOMOBILE AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA UAW, and STUGLIN, FRANK in their 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.

AF#4284 Decided by a vote of 6-0 to: (1) find reason to believe that WOMEN VOTE SMART, and KREMER, AMY S in their 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.

Attest:

March 17, 2022
Date

Vicktoria J Allen Digitally signed by Vicktoria J Allen
Date: 2022.03.17 17:21:18 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AF

March 18, 2022

Elvin Dowling, in official capacity as Treasurer
People for Elvin Dowling
1905 W. Blue Heron Blvd.
P.O. Box 10725
Riviera Beach, FL 33404

C00776518
AF#: 4278

Dear Mr. Dowling,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year-End Report of Receipts and Disbursements every calendar year. This report, covering the period October 14, 2021 through December 31, 2021, shall be filed no later than January 31, 2022. 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 March 16, 2022, the FEC found that there is reason to believe ("RTB") that People for Elvin Dowling and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before January 31, 2022. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is $4,292. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 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 C.F.R. § 111.34. Your payment of $4,292 is due within forty (40) days of the finding, or by April 25, 2022, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: $53,208
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

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

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or April 25, 2022. 11 C.F.R. § 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 C.F.R. § 111.36(c).

Please note, all challenges to an RTB finding and/or calculated civil money penalty should be converted to PDF (Portable Document Format) and 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 they are 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 C.F.R. § 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 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 C.F.R. § 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 C.F.R. § 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 People for Elvin Dowling 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 C.F.R. § 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 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 C.F.R. § 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.

On behalf of the Commission,

Allen J. Dickerson
Chairman

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at RTB is $4,292 for the 2021 Year-End 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 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: People for Elvin Dowling

FEC ID#: C00776518

AF#: 4278

PAYMENT DUE DATE: April 25, 2022

PAYMENT AMOUNT DUE: $4,292

AF427800016

RECEIVED
By Office of the Commission Secretary at 9:21 am, Jul 27, 2022

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

July 27, 2022

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer
Staff Director AP

FROM: Patricia C. Orrock PCO
Chief Compliance Officer

Debbie Chacona DC
Assistant Staff Director
Reports Analysis Division

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the 2021 Year-End Report

Attached is a list 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 2021 Year-End 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, three (3) 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.

Brad Barron for US Senate (AF 4268) filed the 2021 Year-End 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 $0 (previously estimated to be $128,788), thus the fine would be lowered from $17,885 to $0.

Matt Berg for Congress (AF 4276) filed the 2021 Year-End 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 $12,915 (previously estimated to be $77,612), thus the fine would be lowered from $5,563 to $748.

People for Elvin Dowling (AF 4278) filed the 2021 Year-End 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 $1,484 (previously estimated to be $53,208), thus the fine would be lowered from $4,292 to $373.

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

Automobile Club of Michigan Political Action Committee (AF 4267) filed an Amended Statement of Organization after the RTB finding designating Heather Drake 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 committee and its treasurer, in their official capacity, listed on the attached report with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.

(3) Send the appropriate letters.

7/26/2022 8:19 AM

Federal Election Commission
FD Circulation Report Fine Paid
2021 YEAR-END Not Election Sensitive 01/31/2022 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
4265	1199 SERVICE EMPLOYEES INT'L UNION FEDERAL POLITICAL ACTION FUND		C00348540	HELEN SCHAUB	02/09/2022	9	$5,551,417	0	03/16/2022	$10,801	$10,801	04/14/2022	$10,801
4267	AUTOMOBILE CLUB OF MICHIGAN POLITICAL ACTION COMMITTEE		C00197103	HEATHER DRAKE	02/14/2022	14	$160,210	0	03/16/2022	$4,606	$4,606	04/11/2022	$4,606
4283	UAW - V - CAP (UAW VOLUNTARY COMMUNITY ACTION PROGRAM) 'INT'L UNION UNITED AUTOMOBILE AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA UAW		C00002840	FRANK STUGLIN	02/11/2022	11	$5,670,144	1	03/16/2022	$14,293	$14,293	03/29/2022	$14,293

7/26/2022 8:18 AM

Federal Election Commission
FD Circulation Report Fine Not Paid
2021 YEAR-END Not Election Sensitive 01/31/2022 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
4266	AJA SMITH FOR CONGRESS 2022	AJA SMITH	C00719070	AJA SMITH		Not Filed	$78,328 (est)	0	03/16/2022	$5,563	133	$5,563
4268	BRAD BARRON FOR US SENATE	STEPHEN BRADLEY BARRON	C00723270	JILL M. BARRON	03/21/2022	*Not Filed	$0	6	03/16/2022	$17,885	133	NONE
4270	EMILY ROBINSON FOR CONGRESS	EMILY ROBINSON	C00717025	EMILY ROBINSON		Not Filed	$120,240 (est)	8	03/16/2022	$21,462	133	$21,462
4272	FRIENDS OF BARBARA SHARIEF FOR CONGRESS	BARBARA SHARIEF	C00763995	SUZETTE SPALDING	04/10/2022	*Not Filed	$564,194	0	03/16/2022	$15,101	133	$15,101
4273	GEORGE MITRIS FOR CONGRESS	GEORGE MITRIS	C00736736	THOMAS COSTA		Not Filed	$145,106 (est)	5	03/16/2022	$16,096	133	$16,096
4274	GREG LIRETTE FOR CONGRESS	GREGORY LIRETTE	C00765347	KEVIN KITCHEN		Not Filed	$144,587 (est)	2	03/16/2022	$10,731	133	$10,731
4275	JIMMY RODRIGUEZ FOR CONGRESS	JIMMY RODRIGUEZ	C00732875	JIMMY RODRIGUEZ		Not Filed	$614,521 (est)	6	03/16/2022	$39,742	133	$39,742
4276	MATT BERG FOR CONGRESS	MATTHEW RICHARD BERG	C00766642	GERALD D. GUNN	06/23/2022	*Not Filed	$12,915	0	03/16/2022	$5,563	133	$748
4277	OUR BLACK PARTY		C00749069	BETTY CRICHLOW-EBERHARDT	02/07/2022	7	$52,088	0	03/16/2022	$1,318	133	$1,318
4278	PEOPLE FOR ELVIN DOWLING	ELVIN DOWLING	C00776518	ELVIN DOWLING	04/04/2022	*Not Filed	$1,484	0	03/16/2022	$4,292	133	$373
4280	REBA FOR CONGRESS	REBA SHERRILL	C00729624	BRYON FREDRICK MCCOMB		Not Filed	$400,168 (est)	5	03/16/2022	$32,188	133	$32,188
4282	TOGETHER WE THRIVE		C00522458	CHRISTOPHER ZULLO		Not Filed	$104,451 (est)	3	03/16/2022	$12,519	133	$12,519
4284	WOMEN VOTE SMART		C00616912	AMY S. KREMER		Not Filed	$145,616 (est)	5	03/16/2022	$16,096	133	$16,096

* 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	)	
2021 Year-End Report:	)	
1199 SERVICE EMPLOYEES INT'L	)	AF# 4265
UNION FEDERAL POLITICAL ACTION	)	
FUND, and SCHAUB, HELEN as	)	
treasurer;	)	
AJA SMITH FOR CONGRESS 2022, and	)	AF# 4266
SMITH, AJA as treasurer;	)	
AUTOMOBILE CLUB OF MICHIGAN	)	AF# 4267
POLITICAL ACTION COMMITTEE, and	)	
DRAKE, HEATHER as treasurer;	)	
BRAD BARRON FOR US SENATE, and	)	AF# 4268
BARRON, JILL M as treasurer;	)	
EMILY ROBINSON FOR CONGRESS,	)	AF# 4270
and ROBINSON, EMILY as treasurer;	)	
FRIENDS OF BARBARA SHARIEF FOR	)	AF# 4272
CONGRESS, and SPALDING, SUZETTE	)	
as treasurer;	)	
GEORGE MITRIS FOR CONGRESS, and	)	AF# 4273
COSTA, THOMAS MR. as treasurer;	)	
GREG LIRETTE FOR CONGRESS, and	)	AF# 4274
KITCHEN, KEVIN as treasurer;	)	
JIMMY RODRIGUEZ FOR CONGRESS,	)	AF# 4275
and RODRIGUEZ, JIMMY as treasurer;	)	
MATT BERG FOR CONGRESS, and	)	AF# 4276
GUNN, GERALD D as treasurer;	)	
OUR BLACK PARTY, and CRICHLOW-	)	AF# 4277
EBERHARDT, BETTY as treasurer;	)	
PEOPLE FOR ELVIN DOWLING, and	)	AF# 4278
DOWLING, ELVIN as treasurer;	)	
REBA FOR CONGRESS, and MCCOMB,	)	AF# 4280
BRYON FREDRICK as treasurer;	)	
TOGETHER WE THRIVE, and	)	AF# 4282
CHRISTOPHER ZULLO as treasurer;	)	

UAW - V - CAP (UAW VOLUNTARY COMMUNITY ACTION PROGRAM) 'INT'L UNION UNITED AUTOMOBILE AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA UAW, and STUGLIN, FRANK as treasurer;		AF# 4283
WOMEN VOTE SMART, and KREMER, AMY S as treasurer;	))	AF# 4284

CERTIFICATION

I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on July 28, 2022 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2021 Year-End Report as recommended in the Reports Analysis Division's Memorandum dated July 27, 2022, on the following committees:

AF#4265 Decided by a vote of 6-0 to: (1) make a final determination that 1199 SERVICE EMPLOYEES INT'L UNION FEDERAL POLITICAL ACTION FUND, and SCHAUB, HELEN in their 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#4266 Decided by a vote of 6-0 to: (1) make a final determination that AJA SMITH FOR CONGRESS 2022, and SMITH, AJA in their 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#4267 Decided by a vote of 6-0 to: (1) make a final determination that AUTOMOBILE CLUB OF MICHIGAN POLITICAL ACTION COMMITTEE, and DRAKE, HEATHER in their 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#4268 Decided by a vote of 6-0 to: (1) make a final determination that BRAD BARRON FOR US SENATE, and BARRON, JILL M in their 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#4270 Decided by a vote of 6-0 to: (1) make a final determination that EMILY ROBINSON FOR CONGRESS, and ROBINSON, EMILY in their 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#4272 Decided by a vote of 6-0 to: (1) make a final determination that FRIENDS OF BARBARA SHARIEF FOR CONGRESS, and SPALDING, SUZETTE in their 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#4273 Decided by a vote of 6-0 to: (1) make a final determination that GEORGE MITRIS FOR CONGRESS, and COSTA, THOMAS MR. in their 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#4274 Decided by a vote of 6-0 to: (1) make a final determination that GREG LIRETTE FOR CONGRESS, and KITCHEN, KEVIN in their 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#4275 Decided by a vote of 6-0 to: (1) make a final determination that JIMMY RODRIGUEZ FOR CONGRESS, and RODRIGUEZ, JIMMY in their 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#4276 Decided by a vote of 6-0 to: (1) make a final determination that MATT BERG FOR CONGRESS, and GUNN, GERALD D in their 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#4277 Decided by a vote of 6-0 to: (1) make a final determination that OUR BLACK PARTY, and CRICHLOW-EBERHARDT, BETTY in their 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#4278 Decided by a vote of 6-0 to: (1) make a final determination that PEOPLE FOR ELVIN DOWLING, and DOWLING, ELVIN in their 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#4280 Decided by a vote of 6-0 to: (1) make a final determination that REBA FOR CONGRESS, and MCCOMB, BRYON FREDRICK in their 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#4282 Decided by a vote of 6-0 to: (1) make a final determination that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO in their 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#4283 Decided by a vote of 6-0 to: (1) make a final determination that UAW - V - CAP (UAW VOLUNTARY COMMUNITY ACTION PROGRAM) 'INT'L UNION UNITED AUTOMOBILE AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA UAW, and STUGLIN, FRANK in their 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#4284 Decided by a vote of 6-0 to: (1) make a final determination that WOMEN VOTE SMART, and KREMER, AMY S in their 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.

July 28, 2022
Date

Attest:

Vicktoria J Allen Digitally signed by Vicktoria J Allen
Date: 2022.07.28 17:19:44 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AF

July 29, 2022

Elvin Dowling, in official capacity as Treasurer
People for Elvin Dowling
1905 W. Blue Heron Blvd.
P.O. Box 10725
Riviera Beach, FL 33404

C00776518
AF#: 4278

Dear Elvin Dowling,

On March 16, 2022, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that People for Elvin Dowling and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2021 Year-End Report. By letter dated March 18, 2022, the Commission notified you of the RTB finding and the preliminary civil money penalty calculated at the RTB stage to be $4,292, in accordance with the schedule of penalties at 11 C.F.R. § 111.43. Within forty (40) days of the FEC's RTB finding, you, in your official capacity 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.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. Since that time, the amount of the civil money penalty has been changed to reflect the actual level of activity of the Year-End Report. The FEC made a final determination on July 28, 2022 that People for Elvin Dowling 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 $373, in accordance with 11 C.F.R. § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive
Level of Activity: $1,484
Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purposes of calculating the penalty)
Number of Previous Civil Money Penalties Assessed: 0

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

1. If You Choose to 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 failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondent's right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 C.F.R. § 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 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 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,

Allen J. Dickerson
Chairman

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is $373 for the 2021 Year-End 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 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 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: People for Elvin Dowling

FEC ID#: C00776518

AF#: 4278

PAYMENT AMOUNT DUE: $373