



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

June 9, 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/Ben Holly *KDR BH*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2022 April Quarterly Report for the  
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2022 April Quarterly Report in accordance with 52 U.S.C. § 30104(a). The April Quarterly was due on April 15, 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.

Federal Election Commission  
Reason to Believe Circulation Report  
2022 APRIL QUARTERLY Not Election Sensitive 04/15/2022 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4290	C00719070	AJA SMITH FOR CONGRESS 2022	AJA SMITH	AJA SMITH	\$234,984	0		Not Filed	\$78,328 (est)	\$5,563
4291	C00792515	COMMITTEE TO ELECT KYLE SINCLAIR FOR CONGRESSIONAL DISTRICT 20	KYLE E. SINCLAIR	ROBERT CASTANEDA	\$177,629	0	5/30/2022	*Not Filed	\$44,594	\$1,346
4292	C00663435	COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS	MAURO EVERETT GARZA	IRIS ELIZABETH CASTILLO	\$1,072,276	9		Not Filed	\$214,455 (est)	\$33,579
4293	C00764191	CREATE CHANGE NOW		KEN CROW	\$480,825	0		Not Filed	\$240,413 (est)	\$10,332
4294	C00610360	DARIN SMITH FOR WYOMING	DARIN DALE SMITH	ROXANNE OSTLUND	\$466,985	0	5/16/2022	*Not Filed	\$2,798	\$373
4295	C00564187	EDUCATE AND INNOVATE PAC		STACEY MONAHAN	\$425,427	0	5/5/2022	20	\$39,752	\$917
4296	C00717025	EMILY ROBINSON FOR CONGRESS	EMILY ROBINSON	EMILY ROBINSON	\$120,240	9		Not Filed	\$120,240 (est)	\$23,250

4298	C00786384	FRIENDS OF JASON MARINER	JASON MARINER	JASON MARINER	\$254,331	0		Not Filed	\$84,777 (est)	\$5,563
4299	C00764159	GALVESTON COUNTY REPUBLICAN PARTY		DONALD ROBERT POLLOCK	\$113,275	0	5/27/2022	*Not Filed	\$9,891	\$448
4300	C00736736	GEORGE MITRIS FOR CONGRESS	GEORGE MITRIS	THOMAS COSTA	\$145,106	6		Not Filed	\$145,106 (est)	\$17,885
4301	C00765347	GREG LIRETTE FOR CONGRESS	GREGORY LIRETTE	KEVIN KITCHEN	\$144,587	3		Not Filed	\$144,587 (est)	\$12,519
4302	C00780916	JERRY FORD FOR TEXAS	JERRY FORD	SANDRA MARIE FORD	\$136,523	0	5/8/2022	23	\$8,136	\$212
4303	C00732875	JIMMY RODRIGUEZ FOR CONGRESS	JIMMY RODRIGUEZ	JIMMY RODRIGUEZ	\$614,521	7		Not Filed	\$614,521 (est)	\$43,716
4305	C00778886	KATHLEEN FOR CONGRESS	MARY KATHLEEN BROWN	REBECCA RAMIREZ	\$148,617	0	4/22/2022	7	\$37,041	\$527

4307	C00139600	LEAGUE OF SOUTHEASTERN CREDIT UNIONS FEDERAL PAC		BRAD GREEN	\$491,700	0	4/26/2022	11	\$72,483	\$1,798
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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4308	C00386532	LOUIE GOHMERT FOR CONGRESS COMMITTEE	LOUIS GOHMERT	WILLIAM L. LONG	\$406,493	0		Not Filed	\$101,623 (est)	\$7,154
4309	C00791046	LUIS B POZZOLO FOR US CONGRESS	LUIS B. POZZOLO	LUIS B. POZZOLO	\$167,670	0	5/9/2022	24	\$74,437	\$3,358
4310	C00698340	MARKEY VICTORY FUND		STACEY MONAHAN	\$179,368	0	5/5/2022	20	\$33,700	\$917
4311	C00766642	MATT BERG FOR CONGRESS	MATTHEW RICHARD. BERG	GERALD D. GUNN	\$232,836	0		Not Filed	\$77,612 (est)	\$5,563
4312	C00780734	MICHAEL PERKINS FOR CONGRESS	MICHAEL PERKINS	KELLY PERKINS	\$120,011	0		Not Filed	\$40,004 (est)	\$1,346
4313	C00784967	MICHELLE BECKLEY FOR CONGRESS	MICHELLE BECKLEY	MARTIN MIKES	\$196,839	0		Not Filed	\$98,420 (est)	\$5,563
4314	C00475673	NATIONAL SORGHUM PRODUCERS POLITICAL ACTION COMMITTEE		LARRY RICHARDSON	\$258,512	0	5/19/2022	*Not Filed	\$31,900	\$1,346
4315	C00663237	OHIOANS FOR PARENTAL CHOICE		JEFF JACOBSON	\$201,495	0	5/12/2022	27	\$1,480	\$200
4316	C00749069	OUR BLACK PARTY		BETTY CRICHLow-EBERHARDT	\$155,353	0		Not Filed	\$77,677 (est)	\$5,563
4317	C00754283	PATRIOTS FOR AMERICAN LEADERSHIP		EDDIE SHIVERS	\$633,212	1		Not Filed	\$158,303 (est)	\$10,928
4318	C00729624	REBA FOR CONGRESS	REBA SHERRILL	BRYON FREDRICK MCCOMB	\$400,168	6		Not Filed	\$400,168 (est)	\$35,765
4319	C00688069	SUPPORT AMERICAN LEADERS PAC		MATTHEW NELSON TUNSTALL	\$464,815	4		Not Filed	\$154,938 (est)	\$17,486
4320	C00626564	THE SEASONAL EMPLOYER PAC		ELIZABETH WHITLEY	\$155,000	1		Not Filed	\$38,750 (est)	\$1,682
4321	C00522458	TOGETHER WE THRIVE		CHRISTOPHER ZULLO	\$104,451	4		Not Filed	\$104,451 (est)	\$14,308
4322	C00724799	VOTE GABI	GAVRIEL GROSSBARD	ELIZABETH FAUST	\$157,325	0	4/21/2022	6	\$102,911	\$2,146
4323	C00639310	WE HAVE THE PEOPLE PAC	KARA EASTMAN	DAVID PANTOS	\$289,527	0	5/17/2022	*Not Filed	\$83,222	\$5,563
4324	C00616912	WOMEN VOTE SMART		AMY S. KREMER	\$145,616	6		Not Filed	\$145,616 (est)	\$17,885

\* 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	)	
	)	
Reason To Believe Recommendation - 2022	)	
April Quarterly Report for the	)	
Administrative Fine Program:	)	
AJA SMITH FOR CONGRESS 2022, and	)	AF# 4290
SMITH, AJA as treasurer;	)	
COMMITTEE TO ELECT KYLE	)	AF# 4291
SINCLAIR FOR CONGRESSIONAL	)	
DISTRICT 20, and CASTANEDA,	)	
ROBERT as treasurer;	)	
COMMITTEE TO ELECT MAURO	)	AF# 4292
GARZA FOR US CONGRESS, and	)	
CASTILLO, IRIS ELIZABETH as	)	
treasurer;	)	
CREATE CHANGE NOW, and CROW,	)	AF# 4293
KEN as treasurer;	)	
DARIN SMITH FOR WYOMING, and	)	AF# 4294
OSTLUND, ROXANNE as treasurer;	)	
EDUCATE AND INNOVATE PAC, and	)	AF# 4295
MONAHAN, STACEY as treasurer;	)	
EMILY ROBINSON FOR CONGRESS,	)	AF# 4296
and ROBINSON, EMILY as treasurer;	)	
	)	
	)	
	)	
FRIENDS OF JASON MARINER, and	)	AF# 4298
JASON MARINER as treasurer;	)	
GALVESTON COUNTY REPUBLICAN	)	AF# 4299
PARTY, and POLLOCK, DONALD	)	
ROBERT as treasurer;	)	
GEORGE MITRIS FOR CONGRESS, and	)	AF# 4300
COSTA, THOMAS as treasurer;	)	
GREG LIRETTE FOR CONGRESS, and	)	AF# 4301
KITCHEN, KEVIN as treasurer;	)	
JERRY FORD FOR TEXAS, and FORD,	)	AF# 4302
SANDRA MARIE as treasurer;	)	
JIMMY RODRIGUEZ FOR CONGRESS,	)	AF# 4303
and RODRIGUEZ, JIMMY as treasurer;	)	

KATHLEEN FOR CONGRESS, and RAMIREZ, REBECCA as treasurer;	) AF# 4305 )
LEAGUE OF SOUTHEASTERN CREDIT UNIONS FEDERAL PAC, and GREEN, BRAD as treasurer;	) AF# 4307 ) )
LOUIE GOHMERT FOR CONGRESS COMMITTEE, and LONG, WILLIAM L as treasurer;	) AF# 4308 ) )
LUIS B POZZOLO FOR US CONGRESS, and POZZOLO, LUIS B as treasurer;	) AF# 4309 )
MARKEY VICTORY FUND, and MONAHAN, STACEY as treasurer;	) AF# 4310 )
MATT BERG FOR CONGRESS, and GUNN, GERALD D as treasurer;	) AF# 4311 )
MICHAEL PERKINS FOR CONGRESS, and PERKINS, KELLY as treasurer;	) AF# 4312 )
MICHELLE BECKLEY FOR CONGRESS, and MIKES, MARTIN as treasurer;	) AF# 4313 )
NATIONAL SORGHUM PRODUCERS POLITICAL ACTION COMMITTEE, and RICHARDSON, LARRY as treasurer;	) AF# 4314 ) )
OHIOANS FOR PARENTAL CHOICE, and JACOBSON, JEFF as treasurer;	) AF# 4315 )
OUR BLACK PARTY, and CRICHLAW- EBERHARDT, BETTY as treasurer;	) AF# 4316 )
PATRIOTS FOR AMERICAN LEADERSHIP, and SHIVERS, EDDIE as treasurer;	) AF# 4317 ) )
REBA FOR CONGRESS, and MCCOMB, BRYON FREDRICK as treasurer;	) AF# 4318 )
SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON as treasurer;	) AF# 4319 ) )
THE SEASONAL EMPLOYER PAC, and ELIZABETH WHITLEY as treasurer;	) AF# 4320 )
TOGETHER WE THRIVE, and CHRISTOPHER ZULLO as treasurer;	) AF# 4321 )
VOTE GABI, and FAUST, ELIZABETH as treasurer;	) AF# 4322 )
WE HAVE THE PEOPLE PAC, and PANTOS, DAVID as treasurer;	) AF# 4323 )
WOMEN VOTE SMART, and KREMER, AMY S as treasurer;	) AF# 4324 )

CERTIFICATION

I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on June 13, 2022 the Commission took the following actions on the Reason To Believe Recommendation - 2022 April Quarterly Report for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated June 09, 2022, on the following committees:

AF#4290 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#4291 Decided by a vote. of 6-0 to: (1) find reason to believe that COMMITTEE TO ELECT KYLE SINCLAIR FOR CONGRESSIONAL DISTRICT 20, and CASTANEDA, ROBERT 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#4292 Decided by a vote. of 6-0 to: (1) find reason to believe that COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS, and CASTILLO, IRIS ELIZABETH 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#4293 Decided by a vote. of 6-0 to: (1) find reason to believe that CREATE CHANGE NOW, and CROW, KEN 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#4294 Decided by a vote. of 6-0 to: (1) find reason to believe that DARIN SMITH FOR WYOMING, and OSTLUND, ROXANNE 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#4295 Decided by a vote. of 6-0 to: (1) find reason to believe that EDUCATE AND INNOVATE PAC, and MONAHAN, STACEY 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#4296 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#4298 Decided by a vote. of 6-0 to: (1) find reason to believe that FRIENDS OF JASON MARINER, and JASON MARINER 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#4299 Decided by a vote. of 6-0 to: (1) find reason to believe that GALVESTON COUNTY REPUBLICAN PARTY, and POLLOCK, DONALD ROBERT 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#4300 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#4301 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#4302 Decided by a vote. of 6-0 to: (1) find reason to believe that JERRY FORD FOR TEXAS, and FORD, SANDRA MARIE 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#4303 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#4305 Decided by a vote. of 6-0 to: (1) find reason to believe that KATHLEEN FOR CONGRESS, and RAMIREZ, REBECCA 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#4307 Decided by a vote. of 6-0 to: (1) find reason to believe that LEAGUE OF SOUTHEASTERN CREDIT UNIONS FEDERAL PAC, and GREEN, BRAD 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#4308 Decided by a vote. of 6-0 to: (1) find reason to believe that LOUIE GOHMERT FOR CONGRESS COMMITTEE, and LONG, WILLIAM L 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#4309 Decided by a vote. of 6-0 to: (1) find reason to believe that LUIS B POZZOLO FOR US CONGRESS, and POZZOLO, LUIS B 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#4310 Decided by a vote. of 6-0 to: (1) find reason to believe that MARKEY VICTORY FUND, and MONAHAN, STACEY 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#4311 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#4312 Decided by a vote. of 6-0 to: (1) find reason to believe that MICHAEL PERKINS FOR CONGRESS, and PERKINS, KELLY 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#4313 Decided by a vote. of 6-0 to: (1) find reason to believe that MICHELLE BECKLEY FOR CONGRESS, and MIKES, MARTIN 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#4314 Decided by a vote. of 6-0 to: (1) find reason to believe that NATIONAL SORGHUM PRODUCERS POLITICAL ACTION COMMITTEE, and RICHARDSON, LARRY 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#4315 Decided by a vote. of 6-0 to: (1) find reason to believe that OHIOANS FOR PARENTAL CHOICE, and JACOBSON, JEFF 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#4316 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#4317 Decided by a vote. of 6-0 to: (1) find reason to believe that PATRIOTS FOR AMERICAN LEADERSHIP, and SHIVERS, EDDIE 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#4318 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#4319 Decided by a vote. of 6-0 to: (1) find reason to believe that SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON 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#4320 Decided by a vote. of 6-0 to: (1) find reason to believe that THE SEASONAL EMPLOYER PAC, and ELIZABETH WHITLEY 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#4321 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#4322 Decided by a vote. of 6-0 to: (1) find reason to believe that VOTE. GABI, and FAUST, ELIZABETH 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#4323 Decided by a vote. of 6-0 to: (1) find reason to believe that WE HAVE THE PEOPLE PAC, and PANTOS, DAVID 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#4324 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:



Vicktoria J  
Allen

Vicktoria J. Allen  
Acting Deputy Secretary of the  
Commission

Digitally signed by Vicktoria J  
Allen  
Date: 2022.06.13 13:37:29  
-04'00'



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

June 15, 2022

Donald Robert Pollock, in official capacity as Treasurer  
Galveston County Republican Party  
P.O. Box 3522  
Galveston, TX 77552

C00764159

AF#: 4299

Dear Donald Robert Pollock,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an April Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period January 1, 2022 through March 31, 2022, shall be filed no later than April 15, 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.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On June 13, 2022, the FEC found that there is reason to believe ("RTB") that Galveston County Republican Party and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before April 15, 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 \$448. 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 \$448 is due within forty (40) days of the finding, or by July 23, 2022, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$9,891

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:

**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 July 23, 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](mailto:administrativefines@fec.gov). The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the date 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 Galveston County Republican Party 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 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 \$448 for the April Quarterly Report.

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

FEC ID#: C00764159

GALVESTON COUNTY REPUBLICAN PARTY

Page 5 of 5

AF#: 4299

PAYMENT DUE DATE: July 23, 2022

PAYMENT AMOUNT DUE: \$448

**GALVESTON COUNTY REPUBLICAN PARTY**  
**P.O. Box 3522**  
**Galveston, TX 77552**

July 29, 2021

Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463

ATTENTION Administrative Fines

Reference: Federal Election Commission letter, dated June 15, 2022  
Identification Number: C00764159  
AF # 4299

Subject: Challenge RTB Finding and/or Money Penalty

Dear Sir or Madam.

The Galveston County Republican Party, (GCRP) is in receipt of the referenced letter and challenges the findings and assessed penalties.

In March 2022, we reviewed the **INSTRUCTION FOR FEC FORM 3X AND RELATED SCHEDULES** and determined that the GCRP would not have revenue or expenses in the first quarter of 2022 exceeding \$12,500. Therefore, in accordance with **Who Must File** we determined that we were not required to submit a report for the first quarter. On April 14, 2022, we reviewed that section again and came to the same conclusion.

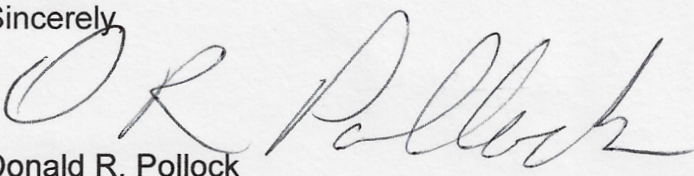
On May 11, 2022, I received an email advising that we should have submitted the quarterly report by April 15<sup>th</sup> and were therefore delinquent. I called Analyst, Kevin Fortkiewicz and explained our rationale for not submitting a report. Mr. Fortkiewicz replied that the minimum cutoff of \$12,500 was only for nonelection years and requested our report. I could not find the reference to nonelection years but agreed to submit the report.

Preparing the report in May, made it automatically delinquent, but after several attempts to use the FEC software to upload the document, it was submitted on May 27, 2023.

The GCRP has used its best efforts to comply with the FEC and Texas Ethics Commission reporting requirements. I therefore request that the FEC waive the assessed penalties.

If there are any questions, please contact the undersigned at [d.r.pollock1944@gmail.com](mailto:d.r.pollock1944@gmail.com) or 409-692-1598.

Sincerely,

  
Donald R. Pollock



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 25, 2022

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

AF# 4299 – Galveston County Republican Party and William Cline Hoffman, in their official capacity as Treasurer (C00764159)

### **Summary of Recommendation**

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$448 civil money penalty.

### **Reason-to-Believe Background**

The 2022 April Quarterly Report was due on April 15, 2022. The respondents filed the report on May 27, 2022, 42 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 June 13, 2022, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2022 April Quarterly Report and made a preliminary determination that the civil money penalty was \$448 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was sent to the respondents’ email address of record from the Reports Analysis Division (“RAD”) on June 15, 2022 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 political committee not authorized by a candidate which is filing on a quarterly basis shall file, in an election year, a report for the period ending March 31 no later than April 15. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).



## Summary of Respondents' Challenge

On June 29, 2022, the Commission received the written response (“challenge”) from the respondents explaining, in part:

In March 2022, we reviewed the INSTRUCTION FOR FEC FORM 3X AND RELATED SCHEDULES and determined that the GCRP would not have revenue or expenses in the first quarter of 2022 exceeding \$12,500. Therefore, in accordance with Who Must File we determined that we were not required to submit a report for the first quarter. On April 14, 2022, we reviewed that section again and came to the same conclusion.

After receiving a notification from the FEC on May 11, 2022, the Committee called the RAD Analyst to explain the Committee’s rationale for not filing the report. The RAD Analyst explained that the \$12,500 threshold did not apply in non-election years and confirmed the Committee’s requirement to file the 2022 April Quarterly Report. The Committee filed the report on May 27, 2022.

The Committee states that it has used its best efforts to comply with federal and state reporting requirements and requests that the penalty be waived.

## Analysis

The respondents state they did not file the 2022 April Quarterly Report based on their interpretation of the Commission’s *Instructions for FEC Form 3X and Related Schedules* (“*Instructions*”). The Committee believed that it was not required to file the report because it did not have revenue or expenses exceeding \$12,500 for the first quarter.

The Reviewing Officer notes that the referenced \$12,500 threshold only applies to a committee’s requirement to file *in an electronic format*. 11 C.F.R. § 104.18(a)(3)(ii). The *Instructions* state, in part:

A political committee is considered to have reason to expect it will exceed the electronic filing threshold for the next two calendar years after the calendar year in which it exceeds \$50,000 in contributions or expenditures. **If it is a new committee, it is considered to have reason to expect it will exceed the electronic filing threshold if it exceeds \$12,500 in contributions or expenditures during the first calendar quarter of the calendar year, or \$25,000 in contributions or expenditures in the first half of the calendar year.** (emphasis added)

The Reviewing Officer confirms that all political committees registered with the FEC must file regular reports, regardless of activity. In election years, political party committees must file at least quarterly. 11 C.F.R. § 104.5(c)(1). A committee’s obligation to file regular financial disclosure reports continues until the committee requests to terminate and that request is approved

by the FEC. 11 C.F.R. § 102.3.<sup>1</sup> Therefore, the Committee was required to timely file the 2022 April Quarterly Report.<sup>2</sup>

The challenge fails to adequately address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. 11 C.F.R. § 111.35(b). The Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$448 civil money penalty.

### **OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4299 involving Galveston County Republican Party and William Cline Hoffman, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4299 that Galveston County Republican Party and William Cline Hoffman, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$448 civil money penalty; and
3. Send the appropriate letter.

### **Attachments**

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

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<sup>1</sup> See <https://www.fec.gov/help-candidates-and-committees/filing-political-party-reports/>. See also <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2022-reporting-dates/supplemental-filing-information-pacs-and-parties-2022/>

<sup>2</sup> The Commission appropriately notified and reminded the Committee of its requirement to file the 2022 April Quarterly Report. See Attachments 2, 3, and 4.

## 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 Galveston County Republican Party:
  - A) Non-Filer Letter, dated May 4, 2022, referencing the 2022 April Quarterly Report (sent via electronic mail to: d.r.pollock1944@gmail.com);
  - B) Reason-to-Believe Letter, dated June 15, 2022, referencing the 2022 April Quarterly Report (sent via electronic mail to: d.r.pollock1944@gmail.com).
4. I hereby certify that I have searched the Commission’s public records and find that Galveston County Republican Party filed the 2022 April Quarterly Report with the Commission on May 27, 2022.
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 8<sup>th</sup> day of July, 2022.

*Kristin D. Roser*

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





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

May 4, 2022

POLLOCK, DONALD ROBERT, TREASURER  
GALVESTON COUNTY REPUBLICAN PARTY  
P.O. BOX 3522  
GALVESTON, TX 77552

IDENTIFICATION NUMBER: C00764159

REFERENCE: APRIL QUARTERLY REPORT (01/01/2022 - 03/31/2022)

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 with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions 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](http://www.fec.gov).


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. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

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

GALVESTON COUNTY REPUBLICAN PARTY

Page 2 of 2

Sincerely,

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

Deborah Chacona  
Assistant Staff Director

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 political committee not authorized by a candidate which is filing on a quarterly basis shall file, in an election year, a report for the period ending March 31 no later than April 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on April 15, 2022 for the 2022 April 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 Page, Summary Page, and Detailed Summary Pages of the 2022 April Quarterly Report filed by Galveston County Republican Party. The report includes the coverage period of January 1, 2022 through March 31, 2022 and was electronically filed on May 27, 2022.
- 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 25<sup>th</sup> day of August, 2022.

*Rhiannon Magruder*

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

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

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

GALVESTON COUNTY REPUBLICAN PARTY

ADDRESS (number and street)

P.O. BOX 3522

Check if different  
than previously  
reported. (ACC)

GALVESTON

TX

77552

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00764159

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)

## 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)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(b) Monthly  
Report  
Due On:

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

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

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

M M M /

D D D /

Y Y Y Y Y Y

in the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

M M M /

D D D /

Y Y Y Y Y Y

in the  
State of

5. Covering Period

M M M /

D D D /

Y Y Y Y Y Y

through

M M M /

D D D /

Y Y Y Y Y Y

01

01

2022

03

31

2022

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

Pollock, Donald, , ,

Type or Print Name of Treasurer

Signature of Treasurer

Pollock, Donald, , ,

[Electronically Filed]

Date

M M M /

D D D /

Y Y Y Y Y Y

05

27

2022

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 3X**  
Rev. 05/2016

# SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

GALVESTON COUNTY REPUBLICAN PARTY

Report Covering the Period: From: M M / D D / Y Y Y Y 01 / 01 / 2022 To: M M / D D / Y Y Y Y 03 / 31 / 2022

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <span style="border: 1px solid black; padding: 2px;">Y Y Y Y</span> 2022		0.00
(b) Cash on Hand at Beginning of Reporting Period.....	0.00	
(c) Total Receipts (from Line 19) .....	4100.00	4100.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	4100.00	4100.00
7. Total Disbursements (from Line 31).....	5791.70	5791.70
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	- 1691.70	- 1691.70
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	
10. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

## 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 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

**GALVESTON COUNTY REPUBLICAN PARTY**

Report Covering the Period:

From:

M	M	/	D	D	/	Y	Y	Y	Y
0	1		0	1		2	0	2	2

To:

M	M	/	D	D	/	Y	Y	Y	Y
0	3		3	1		2	0	2	2

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	2350.00	2350.00
(ii) Unitemized .....	1750.00	1750.00
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	4100.00	4100.00
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5) .....	4100.00	4100.00
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received .....	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3) .....	0.00	0.00
(b) Levin Funds (from Schedule H5) .....	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)) .....	4100.00	4100.00
20. Total Federal Receipts (subtract Line 18(c) from Line 19) .....	4100.00	4100.00

**DETAILED SUMMARY PAGE**

of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures .....	0.00	0.00
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	0.00	0.00
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E) .....	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....	0.00	0.00
(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 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	5791.70	5791.70
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share .....	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds .....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) .....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	5791.70	5791.70
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	5791.70	5791.70



**DETAILED SUMMARY PAGE**  
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3) .....	4100.00	4100.00
34. Total Contribution Refunds (from Line 28(d)) .....	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33) .....	4100.00	4100.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....▶	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3).....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....▶	0.00	0.00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 25, 2022

William Cline Hoffman, in official capacity as Treasurer  
Galveston County Republican Party  
PO Box 3522  
Galveston, TX 77552

C00764159  
AF# 4299

Dear Treasurer:

On June 13, 2022, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Galveston County Republican Party and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2022 April Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$488 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, all written responses and supporting documentation should be converted to PDF (Portable Document Format) and emailed to the Commission Secretary at [secretary@fec.gov](mailto: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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

November 8, 2022

**MEMORANDUM**

To: The Commission

Through: Alec Palmer  
Staff Director

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

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 4299 – Galveston County  
Republican Party and William Cline Hoffman, in their official capacity as  
Treasurer (C00764159)

On June 13, 2022, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2022 April Quarterly Report and made a preliminary determination that the civil money penalty was \$448 based on the schedule of penalties at 11 C.F.R. § 111.43. On June 29, 2022, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated August 25, 2022 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer confirmed that the Committee was required to file the 2022 April Quarterly Report and noted that the challenge failed to adequately address any of the three valid grounds at 11 C.F.R. § 111.35(b). 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 \$448 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). The Committee filed a response indicating their intent to pay the recommended civil money penalty. *See* Attachment 1.

### **OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4299 involving Galveston County Republican Party and William Cline Hoffman, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4299 that Galveston County Republican Party and William Cline Hoffman, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$448 civil money penalty; and
3. Send the appropriate letter.

### **Attachments**

Attachment 1 – Response to ROR

Galveston County Republican Party  
PO Box 3522  
Galveston, Tx 77552

August 30, 2022

Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463  
ATTN: Commission Secretary

Subject: AF#4299 –Galveston County Republican Party (C00764159) Administrative Review Findings Response

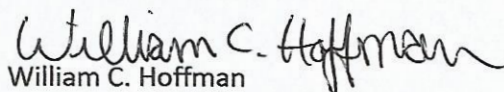
Dear Commission Secretary,

The Galveston County Republican Party has received the Reviewing Officer's Recommendations dated August 25. The recommended civil money penalty of \$448.00 will be remitted to the Federal Election Commission. In an effort to prevent recurrence of any filing delinquencies, the Galveston County Republican Party Treasurer and Finance Committee will review, monitor, and comply with future deadlines and reporting requirements in these or similar financial matters.

Please confirm the address to which the civil money fine should be sent.

Also note that Don Pollock is no longer the Treasurer of the Galveston County Republican Party and future correspondence should be sent to the current Treasurer, William C. Hoffman.

Best Regards,

  
William C. Hoffman

Treasurer  
Galveston County Republican Party

BEFORE THE FEDERAL ELECTION COMMISSION

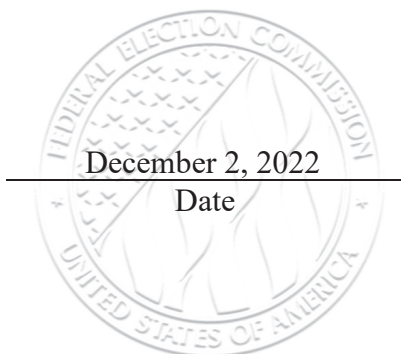
In the Matter of )  
 ) AF 4299  
Final Determination Recommendation – )  
Galveston County Republican Party and )  
William Cline Hoffman, in their official )  
capacity as Treasurer (C00764159) )

CERTIFICATION

I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on December 01, 2022, the Commission decided by a vote of 6-0 to take the following actions in AF 4299:

1. Adopt the Reviewing Officer recommendation for AF# 4299 involving Galveston County Republican Party and William Cline Hoffman, in their official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 4299 that Galveston County Republican Party and William Cline Hoffman, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$448 civil money penalty.
3. Send the appropriate letter.

Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.



Attest:

**Vicktoria J  
Allen**

Vicktoria J. Allen  
Acting Deputy Secretary of the  
Commission

Digitally signed by  
Vicktoria J Allen  
Date: 2022.12.02 11:19:26  
-05'00'



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 7, 2022

William Cline Hoffman, in official capacity as Treasurer  
Galveston County Republican Party  
PO Box 3522  
Galveston, TX 77552

C00764159  
AF# 4299

Dear William Cline Hoffman:

On June 13, 2022, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Galveston County Republican Party and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2022 April Quarterly Report. By letter dated June 15, 2022, the Commission sent notification of the RTB finding that included a civil money penalty calculated at \$448 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On June 29, 2022, 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 Galveston County Republican Party 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 \$448 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on August 25, 2022.

On December 1, 2022, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Galveston County Republican Party 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 \$448. 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 that 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. 1158) or (202) 694-1158.

On behalf of the Commission,



Allen Dickerson  
Chairman

Attachment

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## **ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at final determination is \$448 for the 2022 April Quarterly Report.

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

FEC ID#: C00764159

AF#: 4299

PAYMENT AMOUNT DUE: \$448