



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
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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;	)	
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;	)	

Federal Election Commission  
 Certification for Administrative Fines  
 June 13, 2022

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#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**

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

Vicktoria J. Allen  
 Acting Deputy Secretary of the  
 Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

June 15, 2022

Betty Crichlow-Eberhardt, in official capacity as Treasurer  
Our Black Party  
5128 Baltimore Avenue  
Hyattsville, MD 20781

C00749069

AF#: 4316

Dear Betty Crichlow-Eberhardt,

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. 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. § 30109g(a)(4). On June 13, 2022, the FEC found that there is reason to believe ("RTB") that Our Black 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 \$5,563. 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 \$5,563 is due within forty (40) days of the finding, or by July 23, 2022, and is based on these factors:

Sensitivity of Report: Not Election Sensitive

Level of Activity: \$77,677

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:

OUR BLACK PARTY

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

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

OUR BLACK PARTY

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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 Our Black 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 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.



OUR BLACK PARTY

Page 4 of 5

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 \$5,563 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: Our Black Party

FEC ID#: C00749069

OUR BLACK PARTY

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AF#: 4316

PAYMENT DUE DATE: July 23, 2022

PAYMENT AMOUNT DUE: \$5,563

**RECEIVED**

By Office of the Commission Secretary at 11:42 am, Nov 09, 2022



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

November 9, 2022

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP*

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2022 April Quarterly 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 2022 April Quarterly Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

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

For your information, eight (8) 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.

Aja Smith for Congress 2022 (AF 4290) filed the 2022 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money

penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$18,160 (previously estimated to be \$78,328), thus the fine would be lowered from \$5,563 to \$748.

Create Change Now (AF 4293) filed the 2022 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$24,458 (previously estimated to be \$240,413), thus the fine would be lowered from \$10,332 to \$748.

Louie Gohmert for Congress Committee (AF 4308) filed the 2022 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$32,017 (previously estimated to be \$101,623), thus the fine would be lowered from \$7,154 to \$1,346.

Matt Berg for Congress (AF 4311) filed the 2022 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$2,794 (previously estimated to be \$77,612), thus the fine would be lowered from \$5,563 to \$373.

Michael Perkins for Congress (AF 4312) disclosed no activity after the RTB finding (previously estimated to be \$40,004), which would result in no civil money penalty (fine previously assessed to be \$1,346).

Our Black Party (AF 4316) filed the 2022 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$8,088 (previously estimated to be \$77,677), thus the fine would be lowered from \$5,563 to \$448.

Patriots for American Leadership (AF 4317) disclosed no activity after the RTB finding (previously estimated to be \$158,303), which would result in no civil money penalty (fine previously assessed to be \$10,928).

The Seasonal Employer PAC (AF 4320) filed the 2022 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$0 (previously estimated to be \$38,750), thus the fine would be lowered from \$1,682 to \$0.

For your information, three (3) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

George Mitris for Congress (AF 4300) filed a Miscellaneous Text Submission after the RTB finding stating that the previous Treasurer resigned. As of today, a new Treasurer has not been officially appointed.

Louie Gohmert for Congress Committee (AF 4308) filed an Amended Statement of Organization after the RTB finding designating James D. Cowart as Treasurer.

The Seasonal Employer PAC (AF 4320) filed an Amended Statement of Organization after the RTB finding designating Peter Delany Jr. as Treasurer.

**RAD Recommendation**

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached 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.

Federal Election Commission  
 FD Circulation Report Fine Paid  
 2022 APRIL QUARTERLY Not Election Sensitive 04/15/2022 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
4294	DARIN SMITH FOR WYOMING	DARIN DALE SMITH	C00610360	ROXANNE OSTLUND	05/16/2022	*Not Filed	\$2,798	0	06/13/2022	\$373	\$373	06/28/2022	\$373
4295	EDUCATE AND INNOVATE PAC		C00564187	STACEY MONAHAN	05/05/2022	20	\$39,752	0	06/13/2022	\$917	\$917	07/20/2022	\$917
4305	KATHLEEN FOR CONGRESS	MARY KATHLEEN BROWN	C00778886	REBECCA RAMIREZ	04/22/2022	7	\$47,655	0	06/13/2022	\$527	\$527	07/14/2022	\$527
4307	LEAGUE OF SOUTHEASTERN CREDIT UNIONS FEDERAL PAC		C00139600	BRAD GREEN	04/26/2022	11	\$72,483	0	06/13/2022	\$1,798	\$1,798	07/01/2022	\$1,798
4315	OHIOANS FOR PARENTAL CHOICE		C00663237	JEFF JACOBSON	05/12/2022	27	\$1,480	0	06/13/2022	\$200	\$200	06/30/2022	\$200
4322	VOTE GABI	GAVRIEL GROSSBARD	C00724799	ELIZABETH FAUST	04/21/2022	6	\$102,911	0	06/13/2022	\$2,146	\$2,146	06/16/2022	\$2,146

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

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2022 APRIL QUARTERLY Not Election Sensitive 04/15/2022 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
4290	AJA SMITH FOR CONGRESS 2022	AJA SMITH	C00719070	AJA SMITH	08/25/2022	*Not Filed	\$18,160	0	06/13/2022	\$5,563	149	\$748
4291	COMMITTEE TO ELECT KYLE SINCLAIR FOR CONGRESSIONAL DISTRICT 20	KYLE E. SINCLAIR	C00792515	ROBERT CASTANEDA	05/30/2022	*Not Filed	\$44,594	0	06/13/2022	\$1,346	149	\$1,346
4292	COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS	MAURO EVERETT GARZA	C00663435	IRIS ELIZABETH CASTILLO	07/15/2022	*Not Filed	\$428,425	9	06/13/2022	\$33,579	149	\$33,579
4293	CREATE CHANGE NOW		C00764191	KEN CROW	10/27/2022	*Not Filed	\$24,458	0	06/13/2022	\$10,332	149	\$748
4296	EMILY ROBINSON FOR CONGRESS	EMILY ROBINSON	C00717025	EMILY ROBINSON		Not Filed	\$120,240 (est)	9	06/13/2022	\$23,250	149	\$23,250
4298	FRIENDS OF JASON MARINER	JASON MARINER	C00786384	JASON MARINER		Not Filed	\$84,777 (est)	0	06/13/2022	\$5,563	149	\$5,563
4300	GEORGE MITRIS FOR CONGRESS	GEORGE MITRIS	C00736736	OFFICE OF TREASURER		Not Filed	\$145,106 (est)	6	06/13/2022	\$17,885	149	\$17,885
4301	GREG LIRETTE FOR CONGRESS	GREGORY LIRETTE	C00765347	KEVIN KITCHEN		Not Filed	\$144,587 (est)	3	06/13/2022	\$12,519	149	\$12,519
4303	JIMMY RODRIGUEZ FOR CONGRESS	JIMMY RODRIGUEZ	C00732875	JIMMY RODRIGUEZ		Not Filed	\$614,521 (est)	7	06/13/2022	\$43,716	149	\$43,716
4308	LOUIE GOHMERT FOR CONGRESS COMMITTEE	LOUIS GOHMERT	C00386532	JAMES D. COWART	07/15/2022	*Not Filed	\$32,017	0	06/13/2022	\$7,154	149	\$1,346
4309	LUIS B POZZOLO FOR US CONGRESS	LUIS B. POZZOLO	C00791046	LUIS B. POZZOLO	05/09/2022	24	\$74,437	0	06/13/2022	\$3,358	149	\$3,358
4310	MARKEY VICTORY FUND		C00698340	STACEY MONAHAN	05/05/2022	20	\$33,700	0	06/13/2022	\$917	149	\$917
4311	MATT BERG FOR CONGRESS	MATTHEW RICHARD BERG	C00766642	GERALD D. GUNN	06/22/2022	*Not Filed	\$2,794	0	06/13/2022	\$5,563	149	\$373
4312	MICHAEL PERKINS FOR CONGRESS	MICHAEL PERKINS	C00780734	KELLY PERKINS	07/21/2022	*Not Filed	**\$0	0	06/13/2022	\$1,346	149	NONE
4313	MICHELLE BECKLEY FOR CONGRESS	MICHELLE BECKLEY	C00784967	MARTIN MIKES		Not Filed	\$98,420 (est)	0	06/13/2022	\$5,563	149	\$5,563
4314	NATIONAL SORGHUM PRODUCERS POLITICAL ACTION COMMITTEE		C00475673	LARRY RICHARDSON	05/19/2022	*Not Filed	\$31,900	0	06/13/2022	\$1,346	149	\$1,346
4316	OUR BLACK PARTY		C00749069	BETTY CRICHLow-EBERHARDT	07/26/2022	*Not Filed	\$8,088	0	06/13/2022	\$5,563	149	\$448
4317	PATRIOTS FOR AMERICAN LEADERSHIP		C00754283	EDDIE SHIVERS		Not Filed	**\$0	1	06/13/2022	\$10,928	149	NONE
4318	REBA FOR CONGRESS	REBA SHERRILL	C00729624	BRYON FREDRICK MCCOMB		Not Filed	\$400,168 (est)	6	06/13/2022	\$35,765	149	\$35,765
4319	SUPPORT AMERICAN LEADERS PAC		C00688069	MATTHEW NELSON TUNSTALL		Not Filed	\$154,938 (est)	4	06/13/2022	\$17,486	149	\$17,486
4320	THE SEASONAL EMPLOYER PAC		C00626564	PETER DELANY, JR.	06/30/2022	*Not Filed	\$0	1	06/13/2022	\$1,682	149	NONE
4321	TOGETHER WE THRIVE		C00522458	CHRISTOPHER ZULLO		Not Filed	\$104,451 (est)	4	06/13/2022	\$14,308	149	\$14,308
4323	WE HAVE THE PEOPLE PAC		C00639310	DAVID PANTOS	05/17/2022	*Not Filed	\$83,222	0	06/13/2022	\$5,563	149	\$5,563
4324	WOMEN VOTE SMART		C00616912	AMY S. KREMER		Not Filed	\$145,616 (est)	6	06/13/2022	\$17,885	149	\$17,885

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

\*\* The committee filed a Form 99 (Miscellaneous Text Document) disclosing no activity for the 2022 April Quarterly reporting period.



## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Administrative Fine Program – Final	)	
Determination Recommendation for the	)	
2022 April Quarterly Report:	)	
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 MS. 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;	)	
GEORGE MITRIS FOR CONGRESS, and	)	AF# 4300
OFFICE OF TREASURER;	)	
GREG LIRETTE FOR CONGRESS, and	)	AF# 4301
KITCHEN, KEVIN as treasurer;	)	
JIMMY RODRIGUEZ FOR CONGRESS,	)	AF# 4303
and RODRIGUEZ, JIMMY as treasurer;	)	
KATHLEEN FOR CONGRESS, and	)	AF# 4305
RAMIREZ, REBECCA as treasurer;	)	
LEAGUE OF SOUTHEASTERN CREDIT	)	AF# 4307
UNIONS FEDERAL PAC, and GREEN,	)	
BRAD as treasurer;	)	
LOUIE GOHMERT FOR CONGRESS	)	AF# 4308
COMMITTEE, and COWART, JAMES D.	)	
as treasurer;	)	
LUIS B POZZOLO FOR US CONGRESS,	)	AF# 4309
and POZZOLO, LUIS B as treasurer;	)	
MARKEY VICTORY FUND, and	)	AF# 4310
MONAHAN, STACEY as treasurer;	)	

Federal Election Commission  
 Certification for Administrative Fines  
 November 14, 2020

MATT BERG FOR CONGRESS, and	)	AF# 4311
GUNN, GERALD D as treasurer;	)	
MICHAEL PERKINS FOR CONGRESS,	)	AF# 4312
and PERKINS, KELLY as treasurer;	)	
MICHELLE BECKLEY FOR CONGRESS,	)	AF# 4313
and MIKES, MARTIN as treasurer;	)	
NATIONAL SORGHUM PRODUCERS	)	AF# 4314
POLITICAL ACTION COMMITTEE, and	)	
RICHARDSON, LARRY as treasurer;	)	
OHIOANS FOR PARENTAL CHOICE,	)	AF# 4315
and JACOBSON, JEFF as treasurer;	)	
OUR BLACK PARTY, and CRICHLAW-	)	AF# 4316
EBERHARDT, BETTY as treasurer;	)	
PATRIOTS FOR AMERICAN	)	AF# 4317
LEADERSHIP, and SHIVERS, EDDIE as	)	
treasurer;	)	
REBA FOR CONGRESS, and MCCOMB,	)	AF# 4318
BRYON FREDRICK as treasurer;	)	
SUPPORT AMERICAN LEADERS PAC,	)	AF# 4319
and TUNSTALL, MATTHEW NELSON as	)	
treasurer;	)	
THE SEASONAL EMPLOYER PAC, and	)	AF# 4320
DELANY, PETER JR. as treasurer;	)	
TOGETHER WE THRIVE, and	)	AF# 4321
CHRISTOPHER ZULLO as treasurer;	)	
VOTE GABI, and FAUST, ELIZABETH as	)	AF# 4322
treasurer;	)	
WE HAVE THE PEOPLE PAC, and	)	AF# 4323
PANTOS, DAVID as treasurer;	)	
WOMEN VOTE SMART, and KREMER,	)	AF# 4324
AMY S as treasurer;	)	

CERTIFICATION

I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on November 14, 2022 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2022 April Quarterly Report, as recommended in the Reports Analysis Division's Memorandum dated November 09, 2022, on the following committees:

AF#4290 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4291 Decided by a vote of 6-0 to: (1) make a final determination 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 assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4292 Decided by a vote of 6-0 to: (1) make a final determination that COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS, and CASTILLO, IRIS ELIZABETH MS. in 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4293 Decided by a vote of 6-0 to: (1) make a final determination that CREATE CHANGE NOW, and CROW, KEN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4294 Decided by a vote of 6-0 to: (1) make a final determination that DARIN SMITH FOR WYOMING, and OSTLUND, ROXANNE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4295 Decided by a vote of 6-0 to: (1) make a final determination that EDUCATE AND INNOVATE PAC, and MONAHAN, STACEY 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4296 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4298 Decided by a vote of 6-0 to: (1) make a final determination that FRIENDS OF JASON MARINER, and JASON MARINER 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4300 Decided by a vote of 6-0 to: (1) make a final determination that GEORGE MITRIS FOR CONGRESS, and OFFICE OF TREASURER, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4301 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4303 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4305 Decided by a vote of 6-0 to: (1) make a final determination that KATHLEEN FOR CONGRESS, and RAMIREZ, REBECCA 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4307 Decided by a vote of 6-0 to: (1) make a final determination 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 assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4308 Decided by a vote of 6-0 to: (1) make a final determination that LOUIE GOHMERT FOR CONGRESS COMMITTEE, and COWART, JAMES 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4309 Decided by a vote of 6-0 to: (1) make a final determination 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 assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4310 Decided by a vote of 6-0 to: (1) make a final determination that MARKEY VICTORY FUND, and MONAHAN, STACEY 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4311 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4312 Decided by a vote of 6-0 to: (1) make a final determination that MICHAEL PERKINS FOR CONGRESS, and PERKINS, KELLY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4313 Decided by a vote of 6-0 to: (1) make a final determination that MICHELLE BECKLEY FOR CONGRESS, and MIKES, MARTIN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4314 Decided by a vote of 6-0 to: (1) make a final determination that NATIONAL SORGHUM PRODUCERS POLITICAL ACTION COMMITTEE, and RICHARDSON, LARRY 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4315 Decided by a vote of 6-0 to: (1) make a final determination that OHIOANS FOR PARENTAL CHOICE, and JACOBSON, JEFF 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4316 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4317 Decided by a vote of 6-0 to: (1) make a final determination that PATRIOTS FOR AMERICAN LEADERSHIP, and SHIVERS, EDDIE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4318 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4319 Decided by a vote of 6-0 to: (1) make a final determination that SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4320 Decided by a vote of 6-0 to: (1) make a final determination that THE SEASONAL EMPLOYER PAC, and DELANY, PETER JR. in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.



Federal Election Commission  
 Certification for Administrative Fines  
 November 14, 2020

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AF#4321 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4322 Decided by a vote of 6-0 to: (1) make a final determination that VOTE GABI, and FAUST, ELIZABETH 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4323 Decided by a vote of 6-0 to: (1) make a final determination that WE HAVE THE PEOPLE PAC, and PANTOS, DAVID 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4324 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

Attest:



November 16, 2022

Date

Vicktoria J Allen

Digitally signed by Vicktoria J  
 Allen  
 Date: 2022.11.16 17:40:14 -05'00'

Vicktoria J. Allen  
 Acting Deputy Secretary of the  
 Commission





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

November 17, 2022

Betty Crichlow-Eberhardt, in official capacity as Treasurer  
Our Black Party  
5128 Baltimore Avenue  
Hyattsville, MD 20781

C00749069

AF#: 4316

Dear Betty Crichlow-Eberhardt,

On June 13, 2022, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Our Black Party and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2022 April Quarterly Report. By letter dated June 15, 2022, the Commission notified you of the RTB finding and the preliminary civil money penalty calculated at the RTB stage to be \$5,563, 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 April Quarterly Report. The FEC made a final determination on November 14, 2022 that Our Black 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, 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: \$8,088

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

OUR BLACK PARTY

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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**

OUR BLACK PARTY

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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 \$448 for the 2022 April Quarterly Report. The payment is due within 30 days of receipt of this letter.

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

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

COMMITTEE NAME: Our Black Party

FEC ID#: C00749069

AF#: 4316

PAYMENT AMOUNT DUE: \$448