



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

December 7, 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 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program

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

The committees listed on the attached RTB Circulation Report either failed to file the report or filed the report no more than thirty (30) days after the due date (considered a late 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 OCTOBER QUARTERLY Not Election Sensitive 10/15/2022 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4400	C00798819	AGODA4CONGRESS	KOMI AGODA-KOUSSEMA	PATRICIA B. KING	\$298,132	0		Not Filed	\$74,533 (est)	\$4,292
4401	C00793752	ANGEL FOR MARYLAND	ANGELA ANGEL	MASONMARIE A. HUMPHREY	\$189,585	0		Not Filed	\$94,793 (est)	\$5,563
4402	C00774455	ASHMI FOR CONGRESS	ASHMI SHETH	EVAN OBERTHALER	\$492,500	0		Not Filed	\$2,689 (est)	\$373
4403	C00804542	BAH FOR CONGRESS	OMAR BAH	OMAR BAH	\$120,132	0		Not Filed	\$60,066 (est)	\$4,292
4404	C00782540	BRUCE O'CONNELL FOR CONGRESS	BRUCE O'CONNELL	SARA SWEKOSKY	\$2,411,557	0		Not Filed	\$401,926 (est)	\$14,306
4405	C00779843	CAROLYN RUSH FOR CONGRESS	CAROLYN RUSH	CAROLYN RUSH	\$109,735	0	11/13/2022	29	\$120	\$120
4406	C00787655	COMMON SENSE POLICIES NYC FOR BRIAN ROBINSON	BRIAN JEFFREY ROBINSON	LINDSEY ROBINSON	\$351,847	0		Not Filed	\$70,369 (est)	\$4,292
4407	C00799478	CORAM FOR COLORADO	DON CORAM	KATIE KENNEDY	\$466,507	0		Not Filed	\$155,502 (est)	\$8,743
4408	C00785865	CORNICELLI FOR CONGRESS	ROBERT MICHAEL CORNICELLI	DOUGLAS KEITH KRONENBERG	\$411,468	0		Not Filed	\$102,867 (est)	\$7,154
4409	C00819730	CORRINE BROWN FOR CONGRESS	CORRINE BROWN	OFFICE OF TREASURER	\$165,600	0		Not Filed	\$165,600 (est)	\$8,743
4410	C00557223	EGRIU FOR CONGRESS	EMIN EGRIU	JANETTE ROSARIO	\$212,608	0		Not Filed	\$30,373 (est)	\$1,346
4411	C00717025	EMILY ROBINSON FOR CONGRESS	EMILY ROBINSON	EMILY ROBINSON	\$120,240	11		Not Filed	\$120,240 (est)	\$26,827
4412	C00803486	EUGENE YU FOR CONGRESS DISTRICT 6	EUGENE YU	EUGENE YU	\$125,222	0		Not Filed	\$41,741 (est)	\$1,346
4413	C00801605	FORT FOR CONGRESS	VINCENT FORT	DEIDRE BROWN	\$153,137	0		Not Filed	\$76,569 (est)	\$5,563
4414	C00763995	FRIENDS OF BARBARA SHARIEF FOR CONGRESS	BARBARA SHARIEF	SUZETTE SPALDING	\$2,035,991	1		Not Filed	\$339,332 (est)	\$15,896
4415	C00769786	FRIENDS OF JAHMAL COLE	JAHMAL COLE	JAHMAL COLE	\$313,711	0		Not Filed	\$44,816 (est)	\$1,346
4416	C00786384	FRIENDS OF JASON MARINER	JASON MARINER	JASON MARINER	\$254,331	1		Not Filed	\$84,777 (est)	\$6,953
4417	C00796284	FRIENDS OF REEMA RASOOL	REEMA RASOOL	HASSAN MIAH	\$153,262	0		Not Filed	\$51,087 (est)	\$4,292
4418	C00736736	GEORGE MITRIS FOR CONGRESS	GEORGE MITRIS	OFFICE OF TREASURER	\$145,106	8		Not Filed	\$145,106 (est)	\$21,462
4419	C00765347	GREG LIRETTE FOR CONGRESS	GREGORY LIRETTE	KEVIN KITCHEN	\$144,587	5		Not Filed	\$144,587 (est)	\$16,096
4420	C00783092	HARBIN FOR GEORGIA, INC	BLAKE HARBIN	BLAKE HARBIN	\$745,087	0		Not Filed	\$248,362 (est)	\$10,332

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4421	C00767798	HOLLY MCCORMACK FOR CONGRESS	HOLLY MCCORMACK	HOLLY MCCORMACK	\$3,767,434	0		Not Filed	\$538,205 (est)	\$15,101
4422	C00775528	HYDE FOR CONGRESS	MARTIN HYDE	MARTIN EDWARD HYDE	\$448,216	0		Not Filed	\$74,702 (est)	\$4,292
4423	C00784066	JESSICA TAYLOR FOR SENATE INC.	JESSICA TAYLOR	JESSICA TAYLOR	\$558,503	0		Not Filed	\$186,168 (est)	\$8,743
4424	C00732875	JIMMY RODRIGUEZ FOR CONGRESS	JIMMY RODRIGUEZ	JIMMY RODRIGUEZ	\$614,521	9		Not Filed	\$614,521 (est)	\$51,665
4425	C00804500	JOHN CONYERS FOR CONGRESS	JOHN CONYERS	BENJAMIN GREGER	\$139,367	0		Not Filed	\$46,456 (est)	\$1,346
4426	C00788547	JOHN PORRO TEXANS FOR	JOHN CHARLES PORRO	JOHN CHARLES PORRO	\$135,910	0	11/8/2022	24	\$185	\$182
4427	C00702332	JOSH BARNETT FOR ARIZONA CONGRESS	JOSH BARNETT	DIANE GUTIERREZ	\$123,188	0		Not Filed	\$30,797 (est)	\$1,346
4428	C00776245	LAHMEYER FOR SENATE INC.	JACKSON RHODES LAHMEYER	LUKE PAULSON	\$1,928,205	0		Not Filed	\$275,458 (est)	\$12,717
4429	C00784967	MICHELLE BECKLEY FOR CONGRESS	MICHELLE BECKLEY	MARTIN MIKES	\$196,839	1		Not Filed	\$98,420 (est)	\$6,953
4430	C00767343	MUAD FOR CONGRESS	MUAD HREZI	YOUSSEF ZARROUK	\$1,178,910	0	10/22/2022	7	\$135,268	\$2,345
4431	C00782300	MURPHY FOR WI	ADAM CHRISTOPHER MURPHY	PENELOPE FORMELLA	\$370,665	0		Not Filed	\$74,133 (est)	\$4,292
4432	C00783324	NEAL WALIA FOR CONGRESS	NEAL WALIA	NAVEEN SHAHI	\$385,418	0		Not Filed	\$77,084 (est)	\$5,563
4433	C00803098	NYKEA FOR CONGRESS	NYKEA PIPPION MCGRIFF	SHERIFAT COPPAGE	\$214,655	0		Not Filed	\$71,552 (est)	\$4,292
4434	C00802231	PACHECO FOR CONGRESS	EDWIN PACHECO	KATHAN MOSPAW-LAMBERT	\$125,568	0		Not Filed	\$62,784 (est)	\$4,292
4435	C00768366	PALMER FOR ILLINOIS	DAVID PALMER	NATHAN DARY	\$423,192	0		Not Filed	\$70,532 (est)	\$4,292
4436	C00799650	PAT DOWELL FOR CONGRESS	PATRICIA R. DOWELL	MATTIE LACY	\$1,037,019	0		Not Filed	\$345,673 (est)	\$12,717
4437	C00797381	PETER K FOR CONGRESS	PETER KOPSAFTIS	OFFICE OF TREASURER	\$153,083	0		Not Filed	\$38,271 (est)	\$1,346
4438	C00729624	REBA FOR CONGRESS	REBA SHERRILL	BRYON FREDRICK MCCOMB	\$400,168	8		Not Filed	\$400,168 (est)	\$42,918
4439	C00780650	REED FOR MISSOURI	RAYMOND REED	CHRISTINA LYNCH	\$112,245	0		Not Filed	\$112,245 (est)	\$7,154
4440	C00781153	RENE LOPEZ FOR CONGRESS	JESUS RENE LOPEZ, JR.	RENE LOPEZ	\$294,723	0		Not Filed	\$49,121 (est)	\$1,346
4441	C00774919	RUTH LUEVANOS FOR CONGRESS	RUTH LUEVANOS	DULCEMONICA DELGADILLO	\$106,204	0	10/31/2022	16	\$2,701	\$134
4442	C00788695	SERGIO ALCUBILLA FOR CONGRESS	SERGIO JOSEPHUS ALCUBILLA III	SERGIO ALCUBILLA	\$208,386	0		Not Filed	\$69,462 (est)	\$4,292

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4443	C00669598	SHERRY GAY-DAGNOGO FOR CONGRESS	SHERRY J. GAY-DAGNOGO	MARSHA BRUHN	\$644,036	0	10/23/2022	8	\$204,223	\$3,805
4444	C00766634	SHERVIN AAZAMI FOR CONGRESS	SHERVIN AAZAMI	SHERVIN AAZAMI	\$566,896	0		Not Filed	\$80,985 (est)	\$5,563
4445	C00778589	STURM4CONGRESS	SCOTT WILLIAM STURM	WILLIAM STURM	\$134,227	0		Not Filed	\$26,845 (est)	\$1,346
4446	C00804534	VANESSA FOR NEW YORK	VANESSA FAJANS-TURNER	JANNEKE HOUSE	\$553,146	0	10/30/2022	15	\$81,346	\$3,035
4447	C00790998	VIMAL PATEL FOR CONGRESS INC	VIMAL PATEL	VIMAL PATEL	\$120,912	0		Not Filed	\$30,228 (est)	\$1,346
4448	C00812321	WES NOFIRE FOR CONGRESS	JOHN WESLEY NOFIRE	MICHAEL STOPP	\$307,913	0		Not Filed	\$153,957 (est)	\$8,743
4449	C00765750	WILLIAM SANCHEZ FOR US SENATE	WILLIAM SANCHEZ	MARCIA RODRIGUEZ	\$524,827	1	11/2/2022	18	\$56,002	\$3,297

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reason To Believe Recommendation –	)	
2022 October Quarterly Report (Non-	)	
Election Sensitive) for the Administrative	)	
Fine Program:	)	
AGODA4CONGRESS, and KING,	)	AF# 4400
PATRICIA B MRS. as treasurer;	)	
ANGEL FOR MARYLAND, and	)	AF# 4401
HUMPHREY, MASONMARIE A as	)	
treasurer;	)	
ASHMI FOR CONGRESS, and	)	AF# 4402
OBERTHALER, EVAN as treasurer;	)	
BAH FOR CONGRESS, and BAH, OMAR	)	AF# 4403
DR. as treasurer;	)	
BRUCE O'CONNELL FOR CONGRESS,	)	AF# 4404
and SWEKOSKY, SARA as treasurer;	)	
CAROLYN RUSH FOR CONGRESS, and	)	AF# 4405
RUSH, CAROLYN as treasurer;	)	
COMMON SENSE POLICIES NYC FOR	)	AF# 4406
BRIAN ROBINSON, and ROBINSON,	)	
LINDSEY as treasurer;	)	
CORAM FOR COLORADO, and	)	AF# 4407
KENNEDY, KATIE as treasurer;	)	
CORNICELLI FOR CONGRESS, and	)	AF# 4408
KRONENBERG, DOUGLAS KEITH as	)	
treasurer;	)	
CORRINE BROWN FOR CONGRESS,	)	AF# 4409
and OFFICE OF TREASURER;	)	
EGRIU FOR CONGRESS, and ROSARIO,	)	AF# 4410
JANETTE as treasurer;	)	
EMILY ROBINSON FOR CONGRESS,	)	AF# 4411
and ROBINSON, EMILY as treasurer;	)	
EUGENE YU FOR CONGRESS	)	AF# 4412
DISTRICT 6, and YU, EUGENE MR. as	)	
treasurer;	)	
FORT FOR CONGRESS, and BROWN,	)	AF# 4413
DEIDRE as treasurer;	)	
FRIENDS OF BARBARA SHARIEF FOR	)	AF# 4414
CONGRESS, and SPALDING, SUZETTE	)	
as treasurer;	)	
FRIENDS OF JAHMAL COLE, and	)	AF# 4415
COLE, JAHMAL as treasurer;	)	

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FRIENDS OF JASON MARINER, and JASON MARINER as treasurer;	)	AF# 4416
FRIENDS OF REEMA RASOOL, and MIAH, HASSAN as treasurer;	)	AF# 4417
GEORGE MITRIS FOR CONGRESS, and OFFICE OF TREASURER;	)	AF# 4418
GREG LIRETTE FOR CONGRESS, and KITCHEN, KEVIN as treasurer;	)	AF# 4419
HARBIN FOR GEORGIA, INC, and HARBIN, BLAKE as treasurer;	)	AF# 4420
HOLLY MCCORMACK FOR CONGRESS, and MCCORMACK, HOLLY as treasurer;	)	AF# 4421
HYDE FOR CONGRESS, and HYDE, MARTIN EDWARD as treasurer;	)	AF# 4422
JESSICA TAYLOR FOR SENATE INC., and TAYLOR, JESSICA as treasurer;	)	AF# 4423
JIMMY RODRIGUEZ FOR CONGRESS, and RODRIGUEZ, JIMMY as treasurer;	)	AF# 4424
JOHN CONYERS FOR CONGRESS, and GREGER, BENJAMIN as treasurer;	)	AF# 4425
JOHN PORRO TEXANS FOR, and PORRO, JOHN CHARLES MR. as treasurer;	)	AF# 4426
JOSH BARNETT FOR ARIZONA CONGRESS, and GUTIERREZ, DIANE as treasurer;	)	AF# 4427
LAHMEYER FOR SENATE INC., and PAULSON, LUKE as treasurer;	)	AF# 4428
MICHELLE BECKLEY FOR CONGRESS, and MIKES, MARTIN as treasurer;	)	AF# 4429
MUAD FOR CONGRESS, and ZARROUK, YOUSSEF as treasurer;	)	AF# 4430
MURPHY FOR WI, and FORMELLA, PENELOPE as treasurer;	)	AF# 4431
NEAL WALIA FOR CONGRESS, and SHAHI, NAVEEN as treasurer;	)	AF# 4432
NYKEA FOR CONGRESS, and COPPAGE, SHERIFAT as treasurer;	)	AF# 4433
PACHECO FOR CONGRESS, and MOSPAW-LAMBERT, KATHAN as treasurer;	)	AF# 4434
PALMER FOR ILLINOIS, and DARY, NATHAN as treasurer;	)	AF# 4435

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PAT DOWELL FOR CONGRESS, and LACY, MATTIE as treasurer;	)	AF# 4436
PETER K FOR CONGRESS, and OFFICE OF TREASURER;	)	AF# 4437
REBA FOR CONGRESS, and MCCOMB, BRYON FREDRICK as treasurer;	)	AF# 4438
REED FOR MISSOURI, and LYNCH, CHRISTINA as treasurer;	)	AF# 4439
RENE LOPEZ FOR CONGRESS, and LOPEZ, RENE as treasurer;	)	AF# 4440
RUTH LUEVANOS FOR CONGRESS, and DELGADILLO, DULCEMONICA as treasurer;	)	AF# 4441
SERGIO ALCUBILLA FOR CONGRESS, and ALCUBILLA, SERGIO MR. as treasurer;	)	AF# 4442
SHERRY GAY-DAGNOGO FOR CONGRESS, and BRUHN, MARSHA as treasurer;	)	AF# 4443
SHERVIN AAZAMI FOR CONGRESS, and AAZAMI, SHERVIN as treasurer;	)	AF# 4444
STURM4CONGRESS, and STURM, WILLIAM as treasurer;	)	AF# 4445
VANESSA FOR NEW YORK, and HOUSE, JANNEKE as treasurer;	)	AF# 4446
VIMAL PATEL FOR CONGRESS INC, and PATEL, VIMAL as treasurer;	)	AF# 4447
WES NOFIRE FOR CONGRESS, and STOPP, MICHAEL as treasurer;	)	AF# 4448
WILLIAM SANCHEZ FOR US SENATE, and RODRIGUEZ, MARCIA as treasurer;	)	AF# 4449



CERTIFICATION

I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on December 08, 2022 the Commission took the following actions on the Reason To Believe Recommendation – 2022 October Quarterly Report (Non-Election Sensitive) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated December 07, 2022, on the following committees:

AF#4400 Decided by a vote of 6-0 to: (1) find reason to believe that AGODA4CONGRESS, and KING, PATRICIA B MRS. 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4401 Decided by a vote of 6-0 to: (1) find reason to believe that ANGEL FOR MARYLAND, and HUMPHREY, MASONMARIE A 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4402 Decided by a vote of 6-0 to: (1) find reason to believe that ASHMI FOR CONGRESS, and OBERTHALER, EVAN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4403 Decided by a vote of 6-0 to: (1) find reason to believe that BAH FOR CONGRESS, and BAH, OMAR DR. 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4404 Decided by a vote of 6-0 to: (1) find reason to believe that BRUCE O'CONNELL FOR CONGRESS, and SWEKOSKY, SARA 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4405 Decided by a vote of 6-0 to: (1) find reason to believe that CAROLYN RUSH FOR CONGRESS, and RUSH, CAROLYN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4406 Decided by a vote of 6-0 to: (1) find reason to believe that COMMON SENSE POLICIES NYC FOR BRIAN ROBINSON, and ROBINSON, LINDSEY 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4407 Decided by a vote of 6-0 to: (1) find reason to believe that CORAM FOR COLORADO, and KENNEDY, KATIE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4408 Decided by a vote of 6-0 to: (1) find reason to believe that CORNICELLI FOR CONGRESS, and KRONENBERG, DOUGLAS KEITH 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4409 Decided by a vote of 6-0 to: (1) find reason to believe that CORRINE BROWN FOR CONGRESS, and OFFICE OF 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4410 Decided by a vote of 6-0 to: (1) find reason to believe that EGRIU FOR CONGRESS, and ROSARIO, JANETTE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4411 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4412 Decided by a vote of 6-0 to: (1) find reason to believe that EUGENE YU FOR CONGRESS DISTRICT 6, and YU, EUGENE MR. 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4413 Decided by a vote of 6-0 to: (1) find reason to believe that FORT FOR CONGRESS, and BROWN, DEIDRE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4414 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF BARBARA SHARIEF FOR CONGRESS, and SPALDING, SUZETTE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4415 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF JAHMAL COLE, and COLE, JAHMAL 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4416 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4417 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF REEMA RASOOL, and MIAH, HASSAN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4418 Decided by a vote of 6-0 to: (1) find reason to believe that GEORGE MITRIS FOR CONGRESS, and OFFICE OF 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4419 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4420 Decided by a vote of 6-0 to: (1) find reason to believe that HARBIN FOR GEORGIA, INC, and HARBIN, BLAKE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4421 Decided by a vote of 6-0 to: (1) find reason to believe that HOLLY MCCORMACK FOR CONGRESS, and MCCORMACK, HOLLY 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4422 Decided by a vote of 6-0 to: (1) find reason to believe that HYDE FOR CONGRESS, and HYDE, MARTIN EDWARD 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4423 Decided by a vote of 6-0 to: (1) find reason to believe that JESSICA TAYLOR FOR SENATE INC., and TAYLOR, JESSICA 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4424 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4425 Decided by a vote of 6-0 to: (1) find reason to believe that JOHN CONYERS FOR CONGRESS, and GREGER, BENJAMIN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4426 Decided by a vote of 6-0 to: (1) find reason to believe that JOHN PORRO TEXANS FOR, and PORRO, JOHN CHARLES MR. 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4427 Decided by a vote of 6-0 to: (1) find reason to believe that JOSH BARNETT FOR ARIZONA CONGRESS, and GUTIERREZ, DIANE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4428 Decided by a vote of 6-0 to: (1) find reason to believe that LAHMEYER FOR SENATE INC., and PAULSON, LUKE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4429 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4430 Decided by a vote of 6-0 to: (1) find reason to believe that MUAD FOR CONGRESS, and ZARROUK, YOUSSEF 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4431 Decided by a vote of 6-0 to: (1) find reason to believe that MURPHY FOR WI, and FORMELLA, PENELOPE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4432 Decided by a vote of 6-0 to: (1) find reason to believe that NEAL WALIA FOR CONGRESS, and SHAHI, NAVEEN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4433 Decided by a vote of 6-0 to: (1) find reason to believe that NYKEA FOR CONGRESS, and COPPAGE, SHERIFAT 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4434 Decided by a vote of 6-0 to: (1) find reason to believe that PACHECO FOR CONGRESS, and MOSPAW-LAMBERT, KATHAN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4435 Decided by a vote of 6-0 to: (1) find reason to believe that PALMER FOR ILLINOIS, and DARY, NATHAN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4436 Decided by a vote of 6-0 to: (1) find reason to believe that PAT DOWELL FOR CONGRESS, and LACY, MATTIE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4437 Decided by a vote of 6-0 to: (1) find reason to believe that PETER K FOR CONGRESS, and OFFICE OF 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4438 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4439 Decided by a vote of 6-0 to: (1) find reason to believe that REED FOR MISSOURI, and LYNCH, CHRISTINA 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4440 Decided by a vote of 6-0 to: (1) find reason to believe that RENE LOPEZ FOR CONGRESS, and LOPEZ, RENE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4441 Decided by a vote of 6-0 to: (1) find reason to believe that RUTH LUEVANOS FOR CONGRESS, and DELGADILLO, DULCEMONICA 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4442 Decided by a vote of 6-0 to: (1) find reason to believe that SERGIO ALCUBILLA FOR CONGRESS, and ALCUBILLA, SERGIO MR. 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4443 Decided by a vote of 6-0 to: (1) find reason to believe that SHERRY GAY-DAGNOGO FOR CONGRESS, and BRUHN, MARSHA 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4444 Decided by a vote of 6-0 to: (1) find reason to believe that SHERVIN AAZAMI FOR CONGRESS, and AAZAMI, SHERVIN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4445 Decided by a vote of 6-0 to: (1) find reason to believe that STURM4CONGRESS, and STURM, WILLIAM 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.



AF#4446 Decided by a vote of 6-0 to: (1) find reason to believe that VANESSA FOR NEW YORK, and HOUSE, JANNEKE 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4447 Decided by a vote of 6-0 to: (1) find reason to believe that VIMAL PATEL FOR CONGRESS INC, and PATEL, VIMAL 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4448 Decided by a vote of 6-0 to: (1) find reason to believe that WES NOFIRE FOR CONGRESS, and STOPP, MICHAEL 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4449 Decided by a vote of 6-0 to: (1) find reason to believe that WILLIAM SANCHEZ FOR US SENATE, and RODRIGUEZ, MARCIA 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.



Attest:

**Vicktoria J  
 Allen**

Digitally signed by Vicktoria  
 J Allen  
 Date: 2022.12.08 18:12:33  
 -05'00'

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Vicktoria J. Allen  
 Acting Deputy Secretary of the  
 Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

December 9, 2022

William Sturm, in official capacity as Treasurer  
Sturm4Congress  
328 Cardinal Drive  
New Braunfels, TX 78130

C00778589

AF#: 4445

Dear William Sturm,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an October Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period July 1, 2022 through September 30, 2022, shall be filed no later than October 15, 2022. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On December 8, 2022, the FEC found that there is reason to believe ("RTB") that Sturm4Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before October 15, 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 \$1,346. 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 \$1,346 is due within forty (40) days of the finding, or by January 17, 2023, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$26,845  
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:

STURM4CONGRESS

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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 January 17, 2023. 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.

STURM4CONGRESS

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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 Sturm4Congress 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.

STURM4CONGRESS

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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 \$1,346 for the October Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](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: Sturm4Congress

FEC ID#: C00778589

STURM4CONGRESS

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AF#: 4445

PAYMENT DUE DATE: January 17, 2023

PAYMENT AMOUNT DUE: \$1,346

1/12/2023

C00778589

AF#: 4445

To Whom It May Concern:

The Sturm4Congress committee was shut down and paperwork submitted to that fact right after the March 1, 2022 primary election was lost.

No monies have been raised since then and Wells Fargo bank account associated with committee account was promptly closed.

There is NO LONGER a Sturm4Congress committee. One penalty payment was paid in the understanding that it was in regards to error in the final paperwork submitted for closure of the committee.

Thank you and I hope this ends this matter,

Scott W. Sturm



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 10, 2023

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

AF# 4445 – Sturm4Congress and William Sturm, in their official capacity as Treasurer (C00778589)

### **Summary of Recommendation**

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$1,346 civil money penalty.

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

The 2022 October Quarterly Report was due on October 15, 2022. The respondents have not yet filed the report. 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 December 8, 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 October Quarterly Report and made a preliminary determination that the civil money penalty was \$1,346 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 December 9, 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 principal campaign committee shall file a report for the quarter ending September 30 no later than October 15. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(a)(1)(i). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

### **Summary of Respondents’ Challenge**

On January 12, 2023, the Commission received the written response (“challenge”) from the Candidate. He states the Committee became inactive after the March 2022 Primary Election, and no money has been raised since that time. The Candidate mentions paying a penalty in a separate matter and submitting final paperwork to the FEC.



## Analysis

The Reviewing Officer recognizes that the Committee may have become inactive after the 2022 Primary Election. However, a committee's filing obligation ends only when a committee files a termination report, *and the Commission notifies them in writing that their termination report has been accepted*. 11 C.F.R § 102.3.<sup>1</sup> On March 14, 2022, the Committee filed a termination report.<sup>2</sup> On March 22, 2022, RAD notified the Committee that its termination report was not accepted due to outstanding reporting issues.<sup>3</sup> On March 30, 2022, the Committee filed an amended termination report which partially corrected the cited reporting issues.<sup>4</sup> To date, the Committee has not resolved all outstanding reporting issues, and the Committee's request for termination has not been approved. Therefore, the respondents were required to file the 2022 October Quarterly Report.<sup>5</sup>

At the time of the RTB finding, the Commission used an estimated level of activity (\$26,845) to calculate the penalty because the 2022 October Quarterly Report had not yet been filed. 11 C.F.R § 111.43(d)(2)(i). To date, the Committee has not yet filed the report. In order to calculate the civil money penalty using the actual level of activity disclosed on the 2022 October Quarterly Report, the Committee shall file the report prior to the Reviewing Officer's Final Determination Recommendation to the Commission and no later than April 7, 2023. The recommended civil money penalty in the Final Determination Recommendation will be calculated using the actual level of activity of the 2022 October Quarterly Report. 11 C.F.R § 111.43(d)(3)(i).

At the time of this Reviewing Officer Recommendation, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$1,346 civil money penalty.

## OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 4445 involving Sturm4Congress and William Sturm, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4445 that Sturm4Congress and William Sturm, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$1,346 civil money penalty; and
3. Send the appropriate letter.

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<sup>1</sup> <https://www.fec.gov/help-candidates-and-committees/terminating-a-committee/>

<sup>2</sup> <https://docquery.fec.gov/pdf/694/202203149493775694/202203149493775694.pdf>

<sup>3</sup> <https://docquery.fec.gov/pdf/251/202203220300138251/202203220300138251.pdf>

<sup>4</sup> <https://docquery.fec.gov/pdf/849/202203309495914849/202203309495914849.pdf>

<sup>5</sup> Commission records indicate the Commission appropriately notified and reminded the Committee of its 2022 October Quarterly reporting requirements on multiple occasions. *See* Attachments 2, 3, and 4.

## **Attachments**

Attachment 1 –

Attachment 2 –

Attachment 3 –

Attachment 4 – Declaration from RAD

Attachment 5 – Declaration from OAR

**DECLARATION OF KRISTIN D. ROSE**

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 Sturm4Congress:
  - A) Non-Filer Letter, dated November 4, 2022, referencing the 2022 October Quarterly Report (sent via electronic mail to: sturm4congress@gmail.com and swsinmbtx4298@gmail.com);
  - B) Reason-to-Believe Letter, dated December 9, 2022, referencing the 2022 October Quarterly Report (sent via electronic mail to: sturm4congress@gmail.com and swsinmbtx4298@gmail.com).
4. I hereby certify that I have searched the Commission’s public records and find that Sturm4Congress has not yet filed the 2022 October Quarterly Report with the Commission.
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 26<sup>th</sup> day of January, 2023.

*Kristin D. Rosen*

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 22, 2022

WILLIAM STURM, TREASURER  
STURM4CONGRESS  
328 CARDINAL DRIVE  
NEW BRAUNFELS, TX 78130

**Response Due Date**  
**04/26/2022**

IDENTIFICATION NUMBER: C00778589

REFERENCE: TERMINATION REPORT (02/10/2022 - 03/14/2022)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. While it is permissible for a person to make a contribution for the general election prior to the primary election, the recipient committee must employ an acceptable accounting method to distinguish between primary and general election contributions. (11 CFR § 102.9(e)) This general election amount must be maintained in the committee's account.

Since the candidate will not participate in the general election, any contribution received for the general election must be returned to the donors or redesignated to the primary if your committee has net debts outstanding for the primary election. To redesignate a contribution the committee must either (1) obtain signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) redesignate the contribution by presumption to the primary election, for undesignated contributions made after the primary but before the general election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing. The notification must give the contributor an opportunity to request a refund. A contribution can only be redesignated to a previous election to the extent that the contribution does not exceed net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i) and (5)(ii)(C))

STURM4CONGRESS

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The attached general election contributions do not appear to have been remedied. Any subsequent report(s) filed with the Commission must disclose the refund or redesignation of any general election contribution. Refunds or redesignations must be done within 60 days after the 2022 Primary Election.

Although the Commission may take further legal action, your prompt action to refund these contributions will be taken into consideration.

2. Your committee has requested that the Commission permit your committee to terminate pursuant to 52 U.S.C. §30103(d) (formerly 2 U.S.C. §433(d)) and 11 CFR §102.3. In order to terminate your committee, you must file amendments to correct any problems on your 2021 July Quarterly Report, 2021 October Quarterly Report, this Termination Report and/or on any previous reports that still contain uncorrected errors or omissions. If you are not certain about what corrections need to be made, please contact the undersigned analyst. Once the FEC receives and approves the corrections to your report(s), it will notify you. Until that time, you must continue to file all required reports.

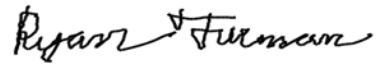
**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit [www.fec.gov/help-candidates-and-committees](http://www.fec.gov/help-candidates-and-committees). For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit [www.fec.gov/help-candidates-and-committees/request-additional-information](http://www.fec.gov/help-candidates-and-committees/request-additional-information). Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1151.

STURM4CONGRESS

Page 3 of 3

Sincerely,

A handwritten signature in black ink that reads "Ryan Furman". The signature is written in a cursive style with a small star-like mark above the letter 'n' in "Furman".

Ryan Furman  
Sr. Campaign Finance & Reviewing Analyst

429

**Apparent General Election Contributions**  
**Sturm4Congress (C00778589)**

**2021 July Quarterly Report**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>
Watkins, Nan	5/27/21	\$500.00	G2022
White, Gloria	5/27/21	\$250.00	G2022
Wilkins, Rachel	4/13/21	\$300.00	G2022

**2021 October Quarterly Report**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>
Anderson, Kristy 0	7/17/21	\$25.00	G2022
Avakian, Adrienne	7/19/21	\$5.00	G2022
Bao, Camille	7/1/21	\$5.00	G2022
Barton, Cyndy	7/9/21	\$25.00	G2022
Biswanger, Patricia	7/28/21	\$15.00	G2022
Blair, Adoree	7/28/21	\$10.00	G2022
Blumenthal, Michelle	7/19/21	\$5.00	G2022
Bond, Jay	7/20/21	\$25.00	G2022
Bond, Jay	7/21/21	\$15.00	G2022
Bond, Jay	7/26/21	\$25.00	G2022
Bresnen, Lynn	7/18/21	\$5.00	G2022
Byers, Theo	7/28/21	\$5.00	G2022
Capps, Jean	7/28/21	\$10.00	G2022
Chakwin, Priscilla	7/19/21	\$5.00	G2022
Childers, Charles	7/18/21	\$10.00	G2022
Clarke, Colette 0	7/7/21	\$100.00	G2022
Cole, Dawn	7/28/21	\$25.00	G2022
Collier, Denise	7/24/21	\$5.00	G2022
Crawford, Marta	7/18/21	\$10.00	G2022
Cunningham, Lynda	7/27/21	\$5.00	G2022
Daleb, Lynne	7/22/21	\$5.00	G2022
Davenport, Liane	7/8/21	\$25.00	G2022
Davenport, Liane	7/8/21	\$25.00	G2022
Day, Cathleen 0	7/7/21	\$15.00	G2022
De Witt, Anne-Marie	7/18/21	\$10.00	G2022
Eimutis, Rachel J	7/28/21	\$5.00	G2022
Elder, Jodi	7/26/21	\$15.00	G2022
Elder, Jodi	7/26/21	\$5.00	G2022
Fleming, Elizabeth	7/30/21	\$10.00	G2022
Frogge, Catherine	7/28/21	\$25.00	G2022
Fryar, Melodie	7/25/21	\$15.00	G2022
Galbraith, David 0	7/17/21	\$50.00	G2022

**Apparent General Election Contributions**  
**Sturm4Congress (C00778589)**

Garshin, Gleb	7/27/21	\$10.00	G2022
Gedigian, Marianne	7/28/21	\$5.00	G2022
Gembala, Diane	7/27/21	\$5.00	G2022
Gentry, Carolyn	7/25/21	\$5.00	G2022
Giangarra, Robin	7/24/21	\$25.00	G2022
Gill, Elizabeth	7/11/21	\$5.00	G2022
Graham, Kim	7/28/21	\$5.00	G2022
Grant, Carolyn	7/30/21	\$7.00	G2022
Hamel Jr, Richard	7/18/21	\$10.00	G2022
Hammond, John	7/28/21	\$25.00	G2022
Hays, Kathy	7/28/21	\$5.00	G2022
Higgins, Randall	7/28/21	\$5.00	G2022
Higgins, Susan	7/17/21	\$10.00	G2022
Howerton, James	7/29/21	\$15.00	G2022
Hutchinson, Joseph	7/28/21	\$5.00	G2022
Jacobo, Kim	7/25/21	\$5.00	G2022
Jones, Holly	7/21/21	\$5.00	G2022
Kawaguchi, Teresa	7/28/21	\$10.00	G2022
Key, Sharon	7/24/21	\$5.00	G2022
Kilburn, Nancy E	7/28/21	\$10.00	G2022
Krzyzewski, Margaret	7/28/21	\$5.00	G2022
Lamkin, John	7/1/21	\$25.00	G2022
Lamping, Joseph	7/28/21	\$2.00	G2022
Landess-Arjes, Cynthia	7/24/21	\$25.00	G2022
Lariviere, Jean	7/18/21	\$15.00	G2022
Lauren Geary, Blake	7/5/21	\$27.00	G2022
Lauridsen, Lee	7/18/21	\$5.00	G2022
Leech, Leslie	7/28/21	\$10.00	G2022
Leoffler, Carol	7/29/21	\$5.00	G2022
Leonard, Clint	7/28/21	\$5.00	G2022
Levy, Daniel	7/28/21	\$25.00	G2022
Lewis-Hutson, Teresa	7/25/21	\$5.00	G2022
Lozano, Nancy 0	7/7/21	\$10.00	G2022
Lumus, Don 0	7/17/21	\$25.00	G2022
Maitre, Debra	7/23/21	\$5.00	G2022
Martinez, Robert	7/30/21	\$25.00	G2022
Meeker, William	7/29/21	\$5.00	G2022
Mewis, Tamara	7/28/21	\$10.00	G2022
Miller, Kent	7/28/21	\$5.00	G2022
Montgomery, LCSW, PhD, Arlene	7/18/21	\$25.00	G2022
Morgan, Steven	7/21/21	\$5.00	G2022



**Apparent General Election Contributions**  
**Sturm4Congress (C00778589)**

Moulder, Liz	7/28/21	\$5.00	G2022
Muhsman, Julie	7/29/21	\$5.00	G2022
Mullins, Keith 0	7/7/21	\$25.00	G2022
Nordberg, John	7/27/21	\$25.00	G2022
Okoro, Ngozi	7/17/21	\$5.00	G2022
Oliphant, Lauren	7/28/21	\$5.00	G2022
Owen, Carolyn 0	7/17/21	\$5.00	G2022
Passino, Ralph	7/1/21	\$50.00	G2022
Peterson, Cynthia	7/18/21	\$15.00	G2022
Piper, Judith	7/25/21	\$10.00	G2022
Powers, Sheryl	7/28/21	\$15.00	G2022
Quinn, Marcella	7/26/21	\$15.00	G2022
Rebeiz, Monica 0	7/17/21	\$10.00	G2022
Reick, Gayle	7/23/21	\$5.00	G2022
Robinson, Kimmy	7/25/21	\$5.00	G2022
Rush, Cassidy	7/28/21	\$10.00	G2022
Russell, Vicky	7/17/21	\$5.00	G2022
Sapp, Juliann	7/18/21	\$5.00	G2022
Schoonhoven, Chris	7/24/21	\$5.00	G2022
Schreiner, Jeremy	7/30/21	\$5.00	G2022
Scott, Randolph H	7/1/21	\$25.00	G2022
Serrano, Sylvia 0	7/17/21	\$25.00	G2022
Shadfan, Lou Ann	7/23/21	\$25.00	G2022
Shaughnessy, Tricia	7/18/21	\$15.00	G2022
Sheridan, Luanna	7/28/21	\$10.00	G2022
Silva, Margaret	7/28/21	\$10.00	G2022
Staff, Laura	7/28/21	\$25.00	G2022
Stamps, John	7/28/21	\$5.00	G2022
Stephenson, Brian	7/27/21	\$5.00	G2022
Stroh, Catherine	7/30/21	\$5.00	G2022
Strong, Brenda	7/1/21	\$10.00	G2022
Strother, Linda	7/30/21	\$5.00	G2022
Taylor, Bette	7/25/21	\$10.00	G2022
Taylor, John	7/24/21	\$18.00	G2022
Torres, Malissa	7/21/21	\$5.00	G2022
Tracy, Angela	7/26/21	\$10.00	G2022
Trevino, Patricia	7/28/21	\$5.00	G2022
Tucker, Eliot	7/1/21	\$25.00	G2022
Tullo, Debra	7/17/21	\$5.00	G2022
Vasquez, Elisa	7/28/21	\$5.00	G2022
Wade, Bruce	7/26/21	\$5.00	G2022

**Apparent General Election Contributions**  
**Sturm4Congress (C00778589)**

Walker, Janet	7/28/21	\$15.00	G2022
Waltrich, Margaret	7/28/21	\$5.00	G2022
Ward, Thomas	7/1/21	\$50.00	G2022
Welch, Johnny	7/28/21	\$5.00	G2022
Williams, Robert	7/1/21	\$15.00	G2022
Williams, Teresa	7/27/21	\$5.00	G2022
Wright, Karen Lee	7/27/21	\$5.00	G2022
Yarosis, Nancy	7/28/21	\$5.00	G2022
Yeung, Tao Ming	7/28/21	\$25.00	G2022
Yoder-Helm, Mari	7/20/21	\$5.00	G2022

**2022 Termination Report**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>
Abramson, Heidi	2/25/22	\$25.00	G2022
Arnett, Ranella	2/19/22	\$10.00	G2022
Baker, Pamela	2/16/22	\$25.00	G2022
Beetem, Doris	2/28/22	\$40.00	G2022
Berry, Mary	2/28/22	\$15.00	G2022
Besson, Jonathan	2/20/22	\$10.00	G2022
Bogiages, Linda	2/17/22	\$25.00	G2022
Bresnen, Lynn	3/1/22	\$15.00	G2022
Brown, Sandra	2/19/22	\$5.00	G2022
Browning, Rufus	2/19/22	\$100.00	G2022
Butts, Virginia	2/19/22	\$100.00	G2022
Callaghan, John 0	2/28/22	\$10.00	G2022
Carroll, Mary	2/24/22	\$5.00	G2022
Castillo, Ray	2/16/22	\$21.00	G2022
Colley, Robert	2/20/22	\$2.70	G2022
Courtney, Carole	2/19/22	\$10.00	G2022
Crawford, Marta	2/18/22	\$10.00	G2022
Cunningham, Lynda	2/24/22	\$5.00	G2022
Dawe, Linda	2/24/22	\$15.00	G2022
Dyer, Sharon	2/19/22	\$10.00	G2022
Dyke, Ruth	2/22/22	\$100.00	G2022
Dyke, Ruth	2/27/22	\$50.00	G2022
Elliott, Scott	2/27/22	\$2.00	G2022
Evans, Brian	2/26/22	\$500.00	G2022
Falteseik, Leslie	2/18/22	\$10.00	G2022
Fink, Patrick	2/20/22	\$3.00	G2022
Francell, Beth	3/2/22	\$10.00	G2022
Frischmann, Justine	2/28/22	\$25.00	G2022

**Apparent General Election Contributions**  
**Sturm4Congress (C00778589)**

Fuller, Jeanne	2/28/22	\$20.00	G2022
Galbraith, David 0	2/18/22	\$21.00	G2022
Garza, Adolio	2/25/22	\$25.00	G2022
Geyer, Lynn	2/20/22	\$50.00	G2022
Gibson, David H	2/22/22	\$100.00	G2022
Gibson, David H	2/28/22	\$100.00	G2022
Gibson, David H	3/6/22	\$100.00	G2022
Goldstein, Julian	2/22/22	\$10.00	G2022
Gonzales, Carmen	2/19/22	\$100.00	G2022
Gregory, Diane	2/17/22	\$5.00	G2022
Gregory, Diane	2/22/22	\$5.00	G2022
Haglund, Sherron	2/19/22	\$5.00	G2022
Harlan, James	2/21/22	\$10.00	G2022
Harris, Judy	2/22/22	\$20.00	G2022
Harrison, Ann Marie	2/18/22	\$10.00	G2022
Hart, Jeremy	2/25/22	\$25.00	G2022
Hendrickson, Sharon	2/28/22	\$5.00	G2022
Henson, Linda	2/25/22	\$10.00	G2022
Hester, Donnell	2/28/22	\$50.00	G2022
Hey, Anna	2/17/22	\$21.00	G2022
Hinojosa, Luis	2/20/22	\$15.00	G2022
Hirsch, Siegmundo	2/19/22	\$10.00	G2022
Hirsch, Siegmundo	2/28/22	\$10.00	G2022
Holmes, Nancy	2/28/22	\$15.00	G2022
Jacques, Frank	2/19/22	\$25.00	G2022
Jacques, Frank	2/25/22	\$25.00	G2022
James, Andrew	2/19/22	\$25.00	G2022
Johnson, Julie	2/18/22	\$5.00	G2022
Jurado, Linda	2/24/22	\$10.00	G2022
Kanagaki, Kenneth	2/19/22	\$25.00	G2022
Kaufmann, Linda	2/19/22	\$25.00	G2022
Kennedy, Patricia	2/25/22	\$10.00	G2022
King, Sue 0	3/1/22	\$10.00	G2022
Klosty, James	2/25/22	\$50.00	G2022
Kuenzi, Cindy	2/19/22	\$25.00	G2022
Lain, Thomas	2/25/22	\$15.00	G2022
Lefforge, Nan	2/17/22	\$5.00	G2022
Lefforge, Nan	2/20/22	\$5.00	G2022
Lefforge, Nan	2/25/22	\$5.00	G2022
Lewis, Alfred	2/28/22	\$25.00	G2022
Lewis, Alfred	3/1/22	\$25.00	G2022

**Apparent General Election Contributions**  
**Sturm4Congress (C00778589)**

Lezak, Anne	2/17/22	\$25.00	G2022
Lundgren, George	2/25/22	\$100.00	G2022
Macdougall, Lorn	3/5/22	\$5.00	G2022
Mack, Kerry	2/24/22	\$5.00	G2022
Malpass, Nancy J	2/25/22	\$25.00	G2022
McClenon, Marci	3/4/22	\$15.00	G2022
McCormick, Kevin	3/2/22	\$5.00	G2022
Melanson, Christianne	2/27/22	\$10.00	G2022
Mendoza, Carole	2/19/22	\$10.00	G2022
Messenheimer, Margrit	2/24/22	\$25.00	G2022
Messer, Darlene 0	2/22/22	\$15.00	G2022
Miller, Bob	2/19/22	\$10.00	G2022
Molony, Donald	2/27/22	\$100.00	G2022
Morrison, Mark	2/28/22	\$25.00	G2022
Morton, Harriett	2/22/22	\$100.00	G2022
Nelson, Diana	2/19/22	\$25.00	G2022
Newland, Linda	2/19/22	\$10.00	G2022
Owen, Carolyn 0	2/17/22	\$5.00	G2022
Papowitz, Evelyn	3/1/22	\$10.00	G2022
Pickrell, Beverly	3/6/22	\$5.00	G2022
Piner, Elizabeth	2/27/22	\$25.00	G2022
Polomski, Lydia	2/19/22	\$5.00	G2022
Polomski, Lydia	2/25/22	\$10.00	G2022
Polomski, Lydia	3/2/22	\$10.00	G2022
Rammelkamp, Abby	2/22/22	\$21.00	G2022
Randle, Janice	2/22/22	\$25.00	G2022
Randle, Janice	2/25/22	\$10.00	G2022
Randle, Janice	2/27/22	\$21.00	G2022
Randle, Janice	3/1/22	\$10.00	G2022
Rebeiz, Monica 0	2/17/22	\$10.00	G2022
Roberts, Joe 0	2/22/22	\$50.00	G2022
Robinson, Kimmy	2/25/22	\$5.00	G2022
Robinson, Simon	3/6/22	\$5.00	G2022
Romanski, Jacqueline	2/19/22	\$25.00	G2022
S Coats, Marvin	2/17/22	\$25.00	G2022
Salter, Dayna	2/28/22	\$10.00	G2022
Santore, George	2/22/22	\$5.00	G2022
Santucci, Allyson	2/25/22	\$5.00	G2022
Schairbaum, Joshua	2/20/22	\$100.00	G2022
Schoenbaum, Stanley	2/24/22	\$6.00	G2022
Segal, William	2/27/22	\$15.00	G2022

**Apparent General Election Contributions**  
**Sturm4Congress (C00778589)**

Seiler, Don	2/17/22	\$25.00	G2022
Shea, Jonathan	2/17/22	\$10.00	G2022
Shiroma, Nadine	2/28/22	\$5.00	G2022
Siegel, Joseph	2/19/22	\$10.00	G2022
Simpson, Wade 0	2/22/22	\$100.00	G2022
Sinha, Shekhar	2/27/22	\$5.00	G2022
Smith, Kathleen	2/17/22	\$21.00	G2022
Smith, Paul	2/24/22	\$25.00	G2022
Smith, Susieq	2/26/22	\$5.00	G2022
Smith, Will	2/21/22	\$10.00	G2022
Sommerhauser, James	2/25/22	\$5.00	G2022
South, Richard	2/17/22	\$50.00	G2022
Spiller, Mark	3/3/22	\$5.00	G2022
Stiles, Mac	2/28/22	\$100.00	G2022
Tabor, Catherine 0	2/28/22	\$25.00	G2022
Waller, Margaret	2/22/22	\$100.00	G2022
Warren, Mark 0	3/2/22	\$40.00	G2022
Watt, Hal	3/7/22	\$5.00	G2022
Weinberg, Florence	2/27/22	\$15.00	G2022
Weinberg, Florence	3/8/22	\$10.00	G2022
Weinstein, Jeffrey	2/28/22	\$5.00	G2022
Welch, Johnny	2/28/22	\$5.00	G2022
White, Gloria 0	3/3/22	\$25.00	G2022
Williams, Robert	3/1/22	\$10.00	G2022
Woods, Sharon	3/3/22	\$50.00	G2022
Yuracka, Cat	3/1/22	\$15.00	G2022
Zelandais, Liz	2/22/22	\$5.00	G2022
Zucker, Sasha	2/20/22	\$30.00	G2022



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

November 4, 2022

STURM, STURM WILLIAM, TREASURER  
STURM4CONGRESS  
328 CARDINAL DRIVE  
NEW BRAUNFELS, TX 78130

IDENTIFICATION NUMBER: C00778589

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2022 - 09/30/2022)

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. The report must be filed 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 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.

STURM4CONGRESS

Page 2 of 2

Sincerely,

A handwritten signature in black ink that reads "Debbie Chacona". The signature is written in a cursive, flowing style.

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 principal campaign committee of a candidate shall file a report for the period ending September 30 no later than October 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on October 15, 2022 for the 2022 October Quarterly Report to be timely filed.
- 3) I hereby certify that I have searched the Commission’s public records and find that Sturm4Congress has not filed the 2022 October Quarterly Report.
- 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 10th day of March, 2023.

*Rhiannon Magruder*

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 13, 2023

William Sturm, in official capacity as Treasurer  
Sturm4Congress  
328 Cardinal Drive  
New Braunfels, TX 78130

C00778589  
AF# 4445

Dear Treasurer:

On December 8, 2022, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Sturm4Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2022 October Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$1,346 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. The Reviewing Officer notes that in order to calculate the civil money penalty using the actual level of activity disclosed on the 2022 October Quarterly Report, the Committee shall file the report prior to the Reviewing Officer’s Final Determination Recommendation to the Commission and no later than April 7, 2023. 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. All written responses and supporting documentation should be converted to PDF (Portable Document Format) and must be emailed to the Commission Secretary at [secretary@fec.gov](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

**RECEIVED**

By Office of the Commission Secretary at 9:32 am, Jan 10, 2024



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

January 10, 2024

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *AP*  
Staff Director

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

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 4445 – Sturm4Congress and William Sturm, in their official capacity as Treasurer (C00778589)

On December 8, 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 October Quarterly Report and made a preliminary determination that the civil money penalty was \$1,346 based on the schedule of penalties at 11 CFR § 111.43. On January 12, 2023, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated March 10, 2023 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference.

The Reviewing Officer recognized the Committee may have become inactive after the 2022 Primary Election but noted that a committee’s filing obligation ends only when a committee files a termination report, *and the Commission notifies them in writing that their termination report has been accepted.* 11 CFR § 102.3. While the Committee had filed a termination report, RAD notified the Committee that its termination report was not accepted due to outstanding reporting issues. At the time the 2022 October Quarterly Report was due, the Committee had not yet resolved all outstanding reporting issues, and the Committee’s request for termination had not been approved. Therefore, the respondents were required to file the 2022 October Quarterly Report. Further, the Reviewing Officer noted that the 2022 October Quarterly Report had not yet been filed and explained that in order to recalculate the civil money penalty using the actual level of activity disclosed on the 2022 October Quarterly Report, the Committee shall file the report prior to the Reviewing Officer’s Final Determination Recommendation to the Commission and no later than April 7, 2023. *See ROR.*

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 CFR § 111.36(f). To date, the respondents have not filed the 2022 October Quarterly Report, nor directly responded to the ROR or OAR's numerous attempts to make contact. However, in response to a separate administrative fine matter, the Committee filed a Miscellaneous Electronic Submission (FEC Form 99)<sup>1</sup> indicating the Committee had no activity after its latest filed report ending March 14, 2022.<sup>2</sup>

At the time of the RTB finding, the Commission used an estimated level of activity (\$26,845) to calculate the penalty because the report had not yet been filed. 11 CFR § 111.43(d)(2)(i). Based on the FEC Form 99, the actual level of activity for the 2022 October Quarterly reporting period is \$0. 11 CFR § 111.43(d)(3)(i). Using the schedule of penalties at 11 CFR § 111.43(a), no civil money penalty should be assessed for a level of activity of \$0. Therefore, the Reviewing Officer recommends that the Commission assess no civil money penalty (reduced from the RTB civil money penalty of \$1,346).

### **OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4445 involving Sturm4Congress and William Sturm, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4445 that Sturm4Congress and William Sturm, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$1,346); and
3. Send the appropriate letter.

### **Attachments**

1. OAR Declaration

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<sup>1</sup> [https://docquery.fec.gov/cgi-bin/fecimg/?\\_202304269581300557+0](https://docquery.fec.gov/cgi-bin/fecimg/?_202304269581300557+0)

<sup>2</sup> In AF# 4377, the Commission made a final determination that the respondents violated 52 U.S.C. § 30104(a) and assessed no civil money penalty (reduced from the RTB civil money penalty of \$1,346).

**DECLARATION OF RHIANNON MAGRUDER**

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission (“Commission”). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A principal campaign committee of a candidate shall file a report for the period ending September 30 no later than October 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on October 15, 2022 for the 2022 October Quarterly Report to be timely filed.
- 3) I hereby certify that I have searched the Commission’s public records and that the document identified herein is the true and accurate copy of:
  - a) Miscellaneous Electronic Submission (FEC Form 99) filed by Sturm4Congress on April 26, 2023.
- 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 10<sup>th</sup> day of January, 2024.

*Rhiannon Magruder*  
Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

**MISCELLANEOUS TEXT (FEC Form 99)**

NAME OF COMMITTEE (In Full)

FEC IDENTIFICATION NUMBER

STURM4CONGRESS

C00778589

Mailing Address 328 Cardinal Drive, New

City	State	ZIP Code
New Braunfels	TX	78130

STURM4CONGRESS  
C00778589

The committee has had zero activity since the last filed report and will not be having any activity going forward.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) AF 4445  
 Final Determination Recommendation: )  
 Sturm4Congress and William Sturm, in )  
 their official capacity as Treasurer )  
 (C00778589) )

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on January 17, 2024, the Commission decided by a vote of 6-0 to take the following actions in AF 4445:

1. Adopt the Reviewing Officer recommendation for AF# 4445 involving Sturm4Congress and William Sturm, in their official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 4445 that Sturm4Congress and William Sturm, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$1,346).
3. Send the appropriate letter.

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



January 17, 2024  
 \_\_\_\_\_  
 Date

Attest:

**Vicktoria J  
 Allen**

Digitally signed by  
 Vicktoria J Allen  
 Date: 2024.01.17 16:25:04  
 -05'00'

\_\_\_\_\_  
 Vicktoria J. Allen  
 Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

January 23, 2024

William Sturm, in official capacity as Treasurer  
Sturm4Congress  
328 Cardinal Drive  
New Braunfels, TX 78130

C00778589  
AF# 4445

Dear Treasurer:

On December 8, 2022, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Sturm4Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2022 October Quarterly Report. By letter dated December 9, 2022, the Commission sent notification of the RTB finding that included a civil money penalty calculated at \$1,346 in accordance with the schedule of penalties at 11 CFR § 111.43. On January 12, 2023, 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. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$1,346 civil money penalty. The Reviewing Officer also noted that in order to calculate the civil money penalty using the actual level of activity disclosed on the 2022 October Quarterly Report, the Committee shall file the report prior to the Reviewing Officer’s Final Determination Recommendation to the Commission. The Reviewing Officer Recommendation was sent to you on March 13, 2023.

On January 17, 2024, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Sturm4Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the level of activity disclosed on the Miscellaneous Electronic Submission filed April 26, 2023, assessed no civil money penalty (reduced from the RTB civil money penalty of \$1,346). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual level of activity, rather than the estimated level of activity, was used. A copy of the Final Determination Recommendation is attached.



The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding this matter, 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,

A handwritten signature in black ink that reads "Sean J. Cooksey". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Sean J. Cooksey  
Chairman