



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

SUBJECT: Reason To Believe Recommendation – 2022 October Quarterly Report
(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 (Election Sensitive) in accordance with 52 U.S.C. § 30104(a). The October Quarterly Report was due on October 15, 2022.

Under the Administrative Fine Program, the October Quarterly Report is considered an election-sensitive filing for authorized committees supporting candidates involved in the general election as well as all unauthorized committees. For the committees listed on the attached RTB Circulation Report, the October Quarterly Report was an election-sensitive filing. The committees either filed the report after the due date, failed to file the report or failed to file the report prior to four (4) days before the general election (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 included on the attached 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 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
4450	C00705384	AMERICA GREAT PAC		JASON PALLANTE	\$272,498	1	11/22/2022	*Not Filed	\$9,570	\$1,121
4451	C00790659	CENTER STREET PAC		JACOB PERRY	\$630,840	0	10/27/2022	*Not Filed	\$630,839	\$10,958
4452	C00792515	COMMITTEE TO ELECT KYLE SINCLAIR FOR CONGRESSIONAL DISTRICT 20	KYLE E. SINCLAIR	ROBERT CASTANEDA	\$297,936	2		Not Filed	\$74,484 (est)	\$7,152
4453	C00764191	CREATE CHANGE NOW		KEN CROW	\$519,925	1	10/27/2022	*Not Filed	\$3,747	\$302
4454	C00659367	HENRY MARTIN FOR CONGRESS	HENRY ROBERT MARTIN	AMBROSIA FERREE	\$241,249	0	11/1/2022	*Not Filed	\$83,932	\$3,672
4455	C00756205	HINDUS OF GEORGIA PAC		SURESH KRISHNAMOORTHY	\$140,616	0	11/9/2022	*Not Filed	\$29,600	\$2,093
4456	C00782177	HOLDEN FOR CONGRESS	STEVEN WESLEY HOLDEN, SR.	MARCUS COOPER	\$243,045	0	10/25/2022	*Not Filed	\$34,192	\$858
4457	C00792812	IROGHAMA OMERE FOR TX	IROGHAMA C. OMERE	IROGHAMA C. OMERE	\$119,066	0		Not Filed	\$119,066 (est)	\$7,948
4458	C00807958	PATRIOTS PAC LLC		MELVIN JOHNSON	\$400,312	0		Not Filed	\$200,156 (est)	\$11,922
4459	C00143362	PLUMBERS LOCAL 519 POLITICAL ACTION COMMITTEE		JEFFREY PENNISTON	\$101,082	0	10/21/2022	6	\$14,494	\$308
4460	C00798363	RESET DC		CHRIS HARDY	\$360,168	0		Not Filed	\$120,056 (est)	\$7,948
4461	C00688069	SUPPORT AMERICAN LEADERS PAC		MATTHEW NELSON TUNSTALL	\$464,815	5		Not Filed	\$154,938 (est)	\$21,458
4462	C00723734	TEXANS FOR MIKAL WILLIAMS	MIKAL D. WILLIAMS	MIMI MONTGOMERY	\$127,515	0	11/3/2022	*Not Filed	\$58,381	\$2,996
4463	C00739581	THE BILLY PREMPEH FOR CONGRESS COMMITTEE	WILLIAM SREBOE PREMPEH	BILLY PREMPEH	\$546,095	0	10/28/2022	*Not Filed	\$85,940	\$3,032
4464	C00522458	TOGETHER WE THRIVE		CHRISTOPHER ZULLO	\$104,451	6		Not Filed	\$104,451 (est)	\$19,870
4465	C00749424	VOTE LOCAL VOTE BLUE		THOMAS PICKARD	\$504,023	0	10/26/2022	*Not Filed	\$24,876	\$378
4466	C00687541	WE BELIEVE WE VOTE		KENT CLAUSEN	\$132,066	1		Not Filed	\$22,011 (est)	\$1,682
4467	C00616912	WOMEN VOTE SMART		AMY S. KREMER	\$145,616	8		Not Filed	\$145,616 (est)	\$23,844

* The committee did not file their report prior to four (4) days before the general election; therefore, per 11 C.F.R. 111.43(e), the report is considered to be not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Reason To Believe Recommendation –)	
2022 October Quarterly Report (Election)	
Sensitive) for the Administrative Fine)	
Program:)	
AMERICA GREAT PAC, and JASON)	AF# 4450
PALLANTE as treasurer;)	
CENTER STREET PAC, and PERRY,)	AF# 4451
JACOB as treasurer;)	
COMMITTEE TO ELECT KYLE)	AF# 4452
SINCLAIR FOR CONGRESSIONAL)	
DISTRICT 20, and CASTANEDA,)	
ROBERT as treasurer;)	
CREATE CHANGE NOW, and CROW,)	AF# 4453
KEN as treasurer;)	
HENRY MARTIN FOR CONGRESS, and)	AF# 4454
FERREE, AMBROSIA as treasurer;)	
HINDUS OF GEORGIA PAC, and)	AF# 4455
KRISHNAMOORTHY, SURESH as)	
treasurer;)	
HOLDEN FOR CONGRESS, and)	AF# 4456
COOPER, MARCUS as treasurer;)	
IROGHAMA OMERE FOR TX, and)	AF# 4457
OMERE, IROGHAMA C as treasurer;)	
PATRIOTS PAC LLC, and JOHNSON,)	AF# 4458
MELVIN as treasurer;)	
PLUMBERS LOCAL 519 POLITICAL)	AF# 4459
ACTION COMMITTEE, and)	
PENNISTON, JEFFREY as treasurer;)	
RESET DC, and HARDY, CHRIS as)	AF# 4460
treasurer;)	
SUPPORT AMERICAN LEADERS PAC,)	AF# 4461
and TUNSTALL, MATTHEW NELSON as)	
treasurer;)	
TEXANS FOR MIKAL WILLIAMS, and)	AF# 4462
MONTGOMERY, MIMI as treasurer;)	
THE BILLY PREMPEH FOR CONGRESS)	AF# 4463
COMMITTEE, and PREMPEH, BILLY as)	
treasurer;)	
TOGETHER WE THRIVE, and)	AF# 4464
CHRISTOPHER ZULLO as treasurer;)	

VOTE LOCAL VOTE BLUE, and)	AF# 4465
PICKARD, THOMAS as treasurer;)	
WE BELIEVE WE VOTE, and KENT)	AF# 4466
CLAUSEN as treasurer;)	
WOMEN VOTE SMART, and KREMER,)	AF# 4467
AMY S as treasurer;)	

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 (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#4450 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICA GREAT PAC, and JASON PALLANTE 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#4451 Decided by a vote of 6-0 to: (1) find reason to believe that CENTER STREET PAC, and PERRY, JACOB 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#4452 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4453 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4454 Decided by a vote of 6-0 to: (1) find reason to believe that HENRY MARTIN FOR CONGRESS, and FERREE, AMBROSIA 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#4455 Decided by a vote of 6-0 to: (1) find reason to believe that HINDUS OF GEORGIA PAC, and KRISHNAMOORTHY, SURESH 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#4456 Decided by a vote of 6-0 to: (1) find reason to believe that HOLDEN FOR CONGRESS, and COOPER, MARCUS 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#4457 Decided by a vote of 6-0 to: (1) find reason to believe that IROGHAMA OMERE FOR TX, and OMERE, IROGHAMA C 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#4458 Decided by a vote of 6-0 to: (1) find reason to believe that PATRIOTS PAC LLC, and JOHNSON, MELVIN 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#4459 Decided by a vote of 6-0 to: (1) find reason to believe that PLUMBERS LOCAL 519 POLITICAL ACTION COMMITTEE, and PENNISTON, JEFFREY 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#4460 Decided by a vote of 6-0 to: (1) find reason to believe that RESET DC, and HARDY, CHRIS 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#4461 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4462 Decided by a vote of 6-0 to: (1) find reason to believe that TEXANS FOR MIKAL WILLIAMS, and MONTGOMERY, MIMI 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.

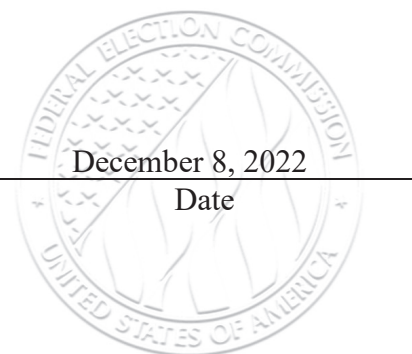
AF#4463 Decided by a vote of 6-0 to: (1) find reason to believe that THE BILLY PREMPEH FOR CONGRESS COMMITTEE, and PREMPEH, BILLY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4464 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4465 Decided by a vote of 6-0 to: (1) find reason to believe that VOTE LOCAL VOTE BLUE, and PICKARD, 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4466 Decided by a vote of 6-0 to: (1) find reason to believe that WE BELIEVE WE VOTE, and KENT CLAUSEN 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#4467 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.



Attest:

Vicktoria J Allen

Digitally signed by Vicktoria J
 Allen
 Date: 2022.12.08 18:38:23 -05'00'

Vicktoria J. Allen
 Acting Deputy Secretary of the
 Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AF

December 9, 2022

Marcus Cooper, in official capacity as Treasurer
Holden for Congress
PO Box 420
Camillus, NY 13031

C00782177
AF#: 4456

Dear Marcus Cooper,

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 August 4, 2022 through September 30, 2022, shall be filed no later than October 15, 2022. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on October 25, 2022, 10 days late.

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 December 8, 2022, the FEC found that there is reason to believe ("RTB") that Holden for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before October 15, 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 \$858. 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 \$858 is due within forty (40) days of the finding, or by January 17, 2023, and is based on these factors:

Election Sensitivity of Report: Election Sensitive
Level of Activity: \$34,192
Number of Days Late: 10
Number of Previous Civil Money Penalties Assessed: 0

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

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

If you should decide to challenge the RTB finding and/or calculated civil money

HOLDEN FOR CONGRESS

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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. The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the date they are electronically received by staff.

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 C.F.R. § 111.35(b). For a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 C.F.R. § 111.35(d).

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

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address, and telephone number of your

HOLDEN FOR CONGRESS

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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 Holden for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

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

3. If You Choose to Pay the Civil Money Penalty

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

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

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

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal

HOLDEN FOR CONGRESS

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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 \$858 for the October Quarterly Report.

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

FEC ID#: C00782177

AF#: 4456

HOLDEN FOR CONGRESS

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PAYMENT DUE DATE: January 17, 2023

PAYMENT AMOUNT DUE: \$858



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

June 27, 2023

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer AP by *KAH*
Staff Director

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

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the
2022 October Quarterly Report (Election Sensitive)

Attached are two lists 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 October Quarterly Report (Election Sensitive). 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.

Please note, the Reports Analysis Division (RAD) recommends that the Commission take no further action against Support American Leaders PAC (AF 4461) based on the 2022 July Quarterly Report Final Determination Recommendation regarding this committee (AF 4378), approved by the Commission on May 19, 2023. This recommendation aligns with prior Commission actions which have allowed for the exclusion and removal of defunct committees. Please see the detailed explanation below to support this recommendation.

Support American Leaders PAC was the subject of five (5) Administrative Fine matters in which the Committee was assessed civil money penalties totaling \$76,500 (AF cases 3828, 3900, 3950, 4187, and 4319). The Committee paid \$55 towards these fines and all of these cases have been transferred to the U. S. Department of the Treasury (“Treasury”) for collection.

The last report filed by the Committee was the 2021 Year-End Report on January 4, 2022, disclosing an ending cash-on-hand balance of negative \$267,554.80. The Committee has not responded to Commission requests to file missing reports. Further, the Committee’s Treasurer, Matthew Tunstall, was recently convicted on charges related to the operation of this PAC¹.

For your information, one (1) committee disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of this case has been provided below.

Reset DC (AF 4460) filed the 2022 October 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 \$14,832 (previously estimated to be \$120,056), thus the fine would be lowered from \$7,948 to \$1,346.

For your information, two (2) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

Center Street PAC (AF 4451) filed an Amended Statement of Organization after the RTB finding designating Matthew O’Brien as Treasurer.

Committee to Elect Kyle Sinclair for Congressional District 20 (AF 4452) filed an Amended Statement of Organization after the RTB finding designating Thomas Datwyler as Treasurer.

¹Per the United States District Court Western District of Texas (Case 1:21-CR-00223-LY), Mr. Tunstall was sentenced to one hundred and twenty (120) months of imprisonment on April 24, 2023.
<https://storage.courtlistener.com/recap/gov.uscourts.txwd.1152054/gov.uscourts.txwd.1152054.138.0.pdf>

RAD Recommendation

- (1) Take no further action against Support American Leaders PAC (AF 4461), and its treasurer, in their official capacity.
- (2) 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.
- (3) Send the appropriate letters.

Federal Election Commission
 FD Circulation Report Fine Paid
 2022 OCTOBER QUARTERLY Election Sensitive 10/15/2022 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
4450	AMERICA GREAT PAC		C00705384	JASON PALLANTE	11/22/2022	*Not Filed	\$9,570	1	12/08/2022	\$1,121	\$1,121	03/14/2023	\$1,121
4451	CENTER STREET PAC		C00790659	MATTHEW O'BRIEN	10/27/2022	12	\$630,839	0	12/08/2022	\$10,958	\$10,958	01/15/2023	\$10,958
4455	HINDUS OF GEORGIA PAC		C00756205	SURESH KRISHNAMOORTHY	11/09/2022	*Not Filed	\$29,600	0	12/08/2022	\$2,093	\$2,093	12/10/2022	\$2,093
4459	PLUMBERS LOCAL 519 POLITICAL ACTION COMMITTEE		C00143362	JEFFREY PENNISTON	10/21/2022	6	\$14,494	0	12/08/2022	\$308	\$308	12/21/2022	\$308
4463	THE BILLY PREMPEH FOR CONGRESS COMMITTEE	WILLIAM SREBOE PREMPEH	C00739581	BILLY PREMPEH	10/28/2022	13	\$85,940	0	12/08/2022	\$3,032	\$3,032	01/24/2023	\$3,032
4465	VOTE LOCAL VOTE BLUE		C00749424	THOMAS PICKARD	10/26/2022	11	\$24,876	0	12/08/2022	\$378	\$378	01/03/2023	\$378

* The committee did not file their report prior to four (4) days before the general election; therefore, per 11 C F R. 111.43(e), the report is considered to be not filed.

Federal Election Commission
 FD Circulation Report Fine Not Paid
 2022 OCTOBER QUARTERLY Election Sensitive 10/15/2022 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
4452	COMMITTEE TO ELECT KYLE SINCLAIR FOR CONGRESSIONAL DISTRICT 20	KYLE E. SINCLAIR	C00792515	THOMAS DATWYLER	01/02/2023	*Not Filed	\$138,496	2	12/08/2022	\$7,152	201	\$7,152
4453	CREATE CHANGE NOW		C00764191	KEN CROW	10/27/2022	12	\$3,747	1	12/08/2022	\$302	201	\$302
4454	HENRY MARTIN FOR CONGRESS	HENRY ROBERT MARTIN	C00659367	AMBROSIA FERREE	11/01/2022	17	\$83,932	0	12/08/2022	\$3,672	201	\$3,672
4456	HOLDEN FOR CONGRESS	STEVEN WESLEY HOLDEN, SR.	C00782177	MARCUS COOPER	10/25/2022	10	\$34,192	0	12/08/2022	\$858	201	\$858
4457	IROGHAMA OMERE FOR TX	IROGHAMA C. OMERE	C00792812	IROGHAMA C. OMERE		Not Filed	\$119,066 (est)	0	12/08/2022	\$7,948	201	\$7,948
4458	PATRIOTS PAC LLC		C00807958	MELVIN JOHNSON	03/27/2023	*Not Filed	\$280,500	0	12/08/2022	\$11,922	201	\$11,922
4460	RESET DC		C00798363	CHRIS HARDY	12/28/2022	*Not Filed	\$14,832	0	12/08/2022	\$7,948	201	\$1,346
4461	SUPPORT AMERICAN LEADERS PAC		C00688069	MATTHEW NELSON TUNSTALL		Not Filed	\$154,938 (est)	5	12/08/2022	\$21,458	201	NFA
4462	TEXANS FOR MIKAL WILLIAMS	MIKAL D. WILLIAMS	C00723734	M MI MONTGOMERY	11/03/2022	19	\$58,381	0	12/08/2022	\$2,996	201	\$2,996
4464	TOGETHER WE THRIVE		C00522458	CHRISTOPHER ZULLO		Not Filed	\$104,451 (est)	6	12/08/2022	\$19,870	201	\$19,870
4466	WE BELIEVE WE VOTE		C00687541	KENT CLAUSEN	01/16/2023	*Not Filed	\$81,925	1	12/08/2022	\$1,682	201	\$1,682
4467	WOMEN VOTE SMART		C00616912	AMY S. KREMER		Not Filed	\$145,616 (est)	8	12/08/2022	\$23,844	201	\$23,844

* The committee did not file their report prior to four (4) days before the general election; therefore, per 11 C.F.R. 111.43(e), the report is considered to be not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Administrative Fine Program – Final)	
Determination Recommendation for the)	
2022 October Quarterly Report (Election)	
Sensitive):)	
AMERICA GREAT PAC, and JASON)	AF# 4450
PALLANTE as treasurer;)	
CENTER STREET PAC, and OBRIEN,)	AF# 4451
MATTHEW as treasurer;)	
COMMITTEE TO ELECT KYLE)	AF# 4452
SINCLAIR FOR CONGRESSIONAL)	
DISTRICT 20, and DATWYLER,)	
THOMAS as treasurer;)	
CREATE CHANGE NOW, and CROW,)	AF# 4453
KEN as treasurer;)	
HENRY MARTIN FOR CONGRESS, and)	AF# 4454
FERREE, AMBROSIA as treasurer;)	
HINDUS OF GEORGIA PAC, and)	AF# 4455
KRISHNAMOORTHY, SURESH as)	
treasurer;)	
HOLDEN FOR CONGRESS, and)	AF# 4456
COOPER, MARCUS as treasurer;)	
IROGHAMA OMERE FOR TX, and)	AF# 4457
OMERE, IROGHAMA C as treasurer;)	
PATRIOTS PAC LLC, and JOHNSON,)	AF# 4458
MELVIN as treasurer;)	
PLUMBERS LOCAL 519 POLITICAL)	AF# 4459
ACTION COMMITTEE, and)	
PENNISTON, JEFFREY as treasurer;)	
RESET DC, and HARDY, CHRIS as)	AF# 4460
treasurer;)	
SUPPORT AMERICAN LEADERS PAC,)	AF# 4461
and TUNSTALL, MATTHEW NELSON as)	
treasurer;)	
TEXANS FOR MIKAL WILLIAMS, and)	AF# 4462
MONTGOMERY, MIMI as treasurer;)	
THE BILLY PREMPEH FOR CONGRESS)	AF# 4463
COMMITTEE, and PREMPEH, BILLY as)	
treasurer;)	
TOGETHER WE THRIVE, and)	AF# 4464
CHRISTOPHER ZULLO as treasurer;)	

VOTE LOCAL VOTE BLUE, and) AF# 4465
 PICKARD, THOMAS as treasurer;)
 WE BELIEVE WE VOTE, and KENT) AF# 4466
 CLAUSEN as treasurer;)
 WOMEN VOTE SMART, and KREMER,) AF# 4467
 AMY S as treasurer;)

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on June 28, 2023 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2022 October Quarterly Report (Election Sensitive), as recommended in the Reports Analysis Division's Memorandum dated June 27, 2023, on the following committees:

AF#4450 Decided by a vote of 6-0 to: (1) make a final determination that AMERICA GREAT PAC, and JASON PALLANTE 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#4451 Decided by a vote of 6-0 to: (1) make a final determination that CENTER STREET PAC, and OBRIEN, MATTHEW 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#4452 Decided by a vote of 6-0 to: (1) make a final determination that COMMITTEE TO ELECT KYLE SINCLAIR FOR CONGRESSIONAL DISTRICT 20, and DATWYLER, THOMAS 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#4453 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#4454 Decided by a vote of 6-0 to: (1) make a final determination that HENRY MARTIN FOR CONGRESS, and FERREE, AMBROSIA 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#4455 Decided by a vote of 6-0 to: (1) make a final determination that HINDUS OF GEORGIA PAC, and KRISHNAMOORTHY, SURESH 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#4456 Decided by a vote of 6-0 to: (1) make a final determination that HOLDEN FOR CONGRESS, and COOPER, MARCUS 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#4457 Decided by a vote of 6-0 to: (1) make a final determination that IROGHAMA OMERE FOR TX, and OMERE, IROGHAMA C 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#4458 Decided by a vote of 6-0 to: (1) make a final determination that PATRIOTS PAC LLC, and JOHNSON, MELVIN 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#4459 Decided by a vote of 6-0 to: (1) make a final determination that PLUMBERS LOCAL 519 POLITICAL ACTION COMMITTEE, and PENNISTON, JEFFREY 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#4460 Decided by a vote of 6-0 to: (1) make a final determination that RESET DC, and HARDY, CHRIS 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#4461 Decided by a vote of 6-0 to: (1) Take no further action against SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON in their official capacity as treasurer; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4462 Decided by a vote of 6-0 to: (1) make a final determination that TEXANS FOR MIKAL WILLIAMS, and MONTGOMERY, MIMI 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#4463 Decided by a vote of 6-0 to: (1) make a final determination that THE BILLY PREMPEH FOR CONGRESS COMMITTEE, and PREMPEH, BILLY 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#4464 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#4465 Decided by a vote of 6-0 to: (1) make a final determination that VOTE LOCAL VOTE BLUE, and PICKARD, THOMAS 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#4466 Decided by a vote of 6-0 to: (1) make a final determination that WE BELIEVE WE VOTE, and KENT CLAUSEN 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#4467 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.

Federal Election Commission
Certification for Administrative Fines
June 28, 2023



Attest:

Vicktoria J Allen Digitally signed by Vicktoria J
Allen
Date: 2023.06.28 17:00:58 -04'00'

Vicktoria J. Allen
Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AF

June 29, 2023

Marcus Cooper, in official capacity as Treasurer
Holden for Congress
PO Box 420
Camillus, NY 13031

C00782177

AF#: 4456
FINE: \$858

Dear Marcus Cooper,

On December 8, 2022, the Federal Election Commission (the "Commission" or "FEC") found reason to believe ("RTB") that Holden for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2022 October Quarterly Report. By letter dated December 9, 2022, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$858, in accordance with the schedule of penalties at 11 C.F.R. § 111.43. Within forty (40) days of the Commission'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. The Commission made a final determination on June 28, 2023 that Holden for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$858, in accordance with 11 C.F.R. § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Election Sensitive
Level of Activity: \$34,192
Number of Days Late: 10
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 must submit a written petition,

HOLDEN FOR CONGRESS

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within thirty (30) days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). If you did not timely raise a factual argument in a challenge to the Commission's RTB finding, your right to present such an argument in an appeal to the U.S. District Court under 52 U.S.C. § 30109 shall be deemed waived. 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 and do not appeal the Commission's final determination to the U.S. District Court (see above), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Treasury will contact you to request payment within five (5) days of receiving the debt. 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. 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 decide to pay the civil money penalty, please follow the payment instructions below. You should make payment within thirty (30) days of receipt of this letter.

You may remit payment by Automated Clearinghouse ("ACH") withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure

HOLDEN FOR CONGRESS

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portal for online collections. Visit <http://www.fec.gov/af/pay.shtml> to be directed to Pay.gov's Administrative Fine Program Payment form. Please use the details above to complete the required fields.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

Partial Payments

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

Settlement Offers

Any offer to settle or compromise a debt owed to the Commission will be rejected. This includes 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. 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,



Dara Lindenbaum
Chair

HOLDEN FOR CONGRESS

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