



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

February 23, 2023

**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 30-Day Post-General Report  
(Unauthorized Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2022 30-Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2022 30-Day Post-General Report.

The committees appearing on the 30-Day Post-General Report list either failed to file the report, filed the report after the due date but within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30-Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30-Day Post-General Report (30G) submitted by an unauthorized quarterly filer that covered the period from October 1, 2022 through November 28, 2022 (59 days), was reviewed for activity which would have required the filing of a 12-Day Pre-General Report (12G). If our research indicated that the filing of a 12G was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 32.20% (19 days (12G Filing Period)/59 days (30G Filing Period)).
- The committees identified through this process as failing to file or failing to timely file the 12G were included in the Reason to Believe Recommendation circulated to the Commission on February 22, 2023. If the same committee also failed to file the 30G in a timely manner, we based the 30G fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12G from the total amount of activity on the 30G. In these cases, the committees will also be assessed a fine for the 30G based on the estimated levels of activity described above and are included on the attached list.
- Every Year-End Report (YE) submitted by an unauthorized quarterly filer that covered the period from October 1, 2022 through December 31, 2022 (92 days) was reviewed for activity which would have required the filing of a 30G. If our research indicated that a 30G was required, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 64.13% (59 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G. If the same committee was required to file the 12G, but failed to file this report, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 43.48% (40 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G.

## **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 POST-GENERAL Not Election Sensitive 12/08/2022 UNAUTH

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4531	C00193854	AMERICAN PHARMACISTS ASSOCIATION POLITICAL ACTION COMMITTEE	SHANNON MORRISON	\$316,381	0	1/10/2023	*Not Filed	\$7,958	\$483
4534	C00790915	BRIDGE PAC	PATRICK CORRIGAN	\$252,393	0	1/31/2023	*Not Filed	\$692	\$402

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
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4542	C00138966	INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 68 POLITICAL ACTION COMMITTEE	JOHN LOMBARDO	\$128,704	0	12/27/2022	19	\$11,000	\$286
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Reason To Believe Recommendation – )  
2022 30-Day Post-General Report )  
(Unauthorized Filers) for the Administrative )  
Fine Program: )

AMERICAN PHARMACISTS ) AF# 4531  
ASSOCIATION POLITICAL ACTION )  
COMMITTEE, and MORRISON, )  
SHANNON as treasurer; )

BRIDGE PAC, and CORRIGAN, ) AF# 4534  
PATRICK as treasurer; )

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February 24, 2023

INTERNATIONAL UNION OF ) AF# 4542  
OPERATING ENGINEERS LOCAL 68 )  
POLITICAL ACTION COMMITTEE, and )  
JOHN LOMBARDO as treasurer; )

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on February 24, 2023 the Commission took the following actions on the Reason To Believe Recommendation – 2022 30-Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated February 23, 2023, on the following committees:

AF#4531 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN PHARMACISTS ASSOCIATION POLITICAL ACTION COMMITTEE, and MORRISON, SHANNON 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.



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Certification for Administrative Fines  
February 24, 2023

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AF#4534 Decided by a vote of 6-0 to: (1) find reason to believe that BRIDGE PAC, and CORRIGAN, PATRICK 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#4542 Decided by a vote of 6-0 to: (1) find reason to believe that INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 68 POLITICAL ACTION COMMITTEE, and JOHN LOMBARDO 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.

Federal Election Commission  
Certification for Administrative Fines  
February 24, 2023

Federal Election Commission  
Certification for Administrative Fines  
February 24, 2023

Federal Election Commission  
Certification for Administrative Fines  
February 24, 2023



Attest:

**Vicktoria J Allen** Digitally signed by Vicktoria J  
Allen  
Date: 2023.02.27 14:04:35 -05'00'

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Vicktoria J. Allen  
Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

February 28, 2023

Patrick Corrigan, in official capacity as Treasurer  
Bridge PAC  
P.O. Box 7365  
Minneapolis, MN 55407

C00790915

AF#: 4534  
FINE: \$402

Dear Patrick Corrigan,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30-Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2022 through November 28, 2022 shall be filed no later than December 8, 2022. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission (the "Commission" or "FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the 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 February 24, 2023, the Commission found that there is reason to believe ("RTB") that Bridge PAC 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 December 8, 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 \$402. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.55. Attachment 1. The FEC's website contains further information about how the administrative fine program works and how the fines are calculated. See <https://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. Your payment of \$402 is due within forty (40) days of the finding, or by April 5, 2023, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$692

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date)

BRIDGE PAC

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are considered not filed for the purpose of calculating the penalty)  
Number of Previous Civil Money Penalties Assessed: 0

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

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

If you decide to challenge the RTB finding and/or calculated civil money penalty, you must email a written response to the FEC's Office of Administrative Review at [administrativefines@fec.gov](mailto:administrativefines@fec.gov). Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or April 5, 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).

The FEC will only consider challenges that are based on at least one of three factors: (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).

If you fail to timely raise a factual argument in your challenge to the 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.

It should also be noted that all challenges to an RTB finding and/or calculated civil money penalty should be converted to PDF (Portable Document Format) and emailed to

BRIDGE PAC

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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.

In addition, 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 challenging the RTB finding and/or calculated civil money penalty, the FEC will conclude that the factual allegations underlying the RTB finding and/or calculated civil money penalty are true and make a final determination that Bridge PAC 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 Commission 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 decide to pay the calculated civil money penalty, please follow the payment instructions below. Upon receipt of your payment, the FEC will send you a final determination 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 portal for online collections. Visit <https://www.fec.gov/af/pay.shtml> to be directed to Pay.gov's Administrative Fine Program Payment form. Please use the details at the top of this letter to complete the required fields.

## **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### **Partial Payments**



BRIDGE PAC

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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.

**Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission will be rejected. This includes 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. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 C.F.R. § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <https://www.fec.gov/af/af.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,



Dara Lindenbaum  
Chair

BRIDGE PAC

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**From:** [Pat Corrigan](#)  
**To:** [FEC Administrative Fines](#)  
**Cc:** [Shukri Abdirahman](#)  
**Subject:** Re: URGENT: FEC Administrative Fine Program Notification – Respond Immediately  
**Date:** Friday, April 7, 2023 4:31:12 PM  
**Attachments:** [Bridge PAC 2022 - Year-End Report \(Amended 3X Filing\).pdf](#)

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Hello Ben - I just tried to call and got voicemail so I am sending this email. Please consider the original email as a challenge to the original fine AF #4534 .

This email is to confirm that we have filed amended FEC FORM 3X (attached) with all of the activity from October 1 - December 31, 2022. Given this amended report has been filed, would it be possible for the fine to be waived?

If not, please let me know and I will pay this fine as the PAC's Treasurer.

Thanks,  
Patrick Corrigan  
Treasurer - Bridge PAC  
516-320-4912

On Tue, Mar 7, 2023 at 12:19 PM FEC Administrative Fines <[AdministrativeFines@fec.gov](mailto:AdministrativeFines@fec.gov)> wrote:

Mr. Corrigan,

Thank you for the message. Although the committee did convert to a Leadership PAC on 7/28/22, Leadership PAC's are still required to file a 30-Day Post-General Report, even if the committee had no 2022 General Election activity (see the second scenario "II." at link below). This report was due on 12/8/22. Please reach me at the number below if you have any questions. Also, please confirm whether your original email response was intended to be a challenge to AF #4534 (see number 1 of attached letter). Thank you,

Ben

<https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2022-reporting-dates/preg-report-notice-pacs-party-committees-2022/>

Ben Holly

Senior Campaign Finance and Reviewing Analyst

Reports Analysis Division / Compliance Branch

(202) 694-1129

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**From:** Pat Corrigan <[pcorrigan@compassprofessional.com](mailto:pcorrigan@compassprofessional.com)>  
**Sent:** Thursday, March 2, 2023 3:16 PM  
**To:** FEC Administrative Fines <[AdministrativeFines@fec.gov](mailto:AdministrativeFines@fec.gov)>  
**Cc:** Shukri Abdirahman <[shukri.abdirahman@gmail.com](mailto:shukri.abdirahman@gmail.com)>  
**Subject:** Fwd: URGENT: FEC Administrative Fine Program Notification – Respond Immediately

Hello,

Bridge PAC (formerly known as Shu for Congress) with a committee ID of C00790915 was converted from a Campaign Committee that lost its primary election to a Leadership PAC on July 28, 2022 (see the link below for the associated filing). The committee did not have any General 2022 Election activity and therefore a Post General FEC Report would not be required.

The activity for 10/1/2022-11/28/2022 was reported on the 2022 Year End Report.

Thank you for your consideration.

Sincerely,

Patrick Corrigan

Treasurer - Bridge PAC

[pcorrigan@compassprofessional.com](mailto:pcorrigan@compassprofessional.com)

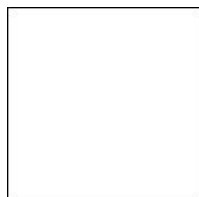
<https://docquery.fec.gov/pdf/147/202207289525077147/202207289525077147.pdf>

----- Forwarded message -----

From: **Shukri Abdirahman** <[shukri.abdirahman@gmail.com](mailto:shukri.abdirahman@gmail.com)>  
Date: Thu, Mar 2, 2023 at 1:45 PM  
Subject: Fwd: URGENT: FEC Administrative Fine Program Notification – Respond Immediately  
To: Pat Corrigan <[pcorrigan@compassprofessional.com](mailto:pcorrigan@compassprofessional.com)>

----- Forwarded message -----

From: <[rad@fec.gov](mailto:rad@fec.gov)>  
Date: Wed, Mar 1, 2023, 1:01 PM  
Subject: URGENT: FEC Administrative Fine Program Notification – Respond Immediately  
To: <[SHUKRI.ABDIRAHMAN@gmail.com](mailto:SHUKRI.ABDIRAHMAN@gmail.com)>



## Federal Election Commission

MAR 1, 2023

Dear Treasurer,

This important e-mail is being sent by the Reports Analysis Division (RAD) of the Federal Election Commission to notify your committee of a potential administrative fine due to a late or unfiled report.

Please find the Letter/Notification is attached to this email.

Please note that this is an automated e-mail; any response to this request for information should not be made via e-mail, as your response will not be accepted. To confirm receipt, please contact Ben Holly, Compliance Analyst, at (202) 694-1129. Alternatively, please call our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or our local number (202) 694-1130.

To ensure delivery, add [rad@fec.gov](mailto:rad@fec.gov) and [rad@fecgov.onmicrosoft.com](mailto:rad@fecgov.onmicrosoft.com) to your address book.

To update your e-mail address, please file an amended Statement of Organization (FEC Form 1). You may include up to two email addresses on your FEC Form 1.

For more information regarding the administrative fine program, please go to <https://www.fec.gov/legal-resources/enforcement/administrative-fines/>.

If you would like to view all of your filings, simply click [here](#).

For general filing information, please go to <https://www.fec.gov/help-candidates-and-committees/>.

Sincerely,

Federal Election Commission (FEC)

This email was sent to: [SHUKRI.ABDIRAHMAN@GMAIL.COM](mailto:SHUKRI.ABDIRAHMAN@GMAIL.COM)

Your Committee ID at FEC: C00790915

FEC-RAD2023211869095

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*This e-mail is intended only for the use of the committee/filer designated as recipient.*





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 1, 2023

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

AF# 4534 – Bridge PAC and Patrick Corrigan, in their official capacity as Treasurer (C00790915)

### **Summary of Recommendation**

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$402 civil money penalty.

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

The 2022 Post-General Report was due on December 8, 2022. The respondents filed a report covering the reporting period on January 31, 2023, 54 days late.<sup>1</sup> 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 February 24, 2023, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2022 Post-General Report and made a preliminary determination that the civil money penalty was \$402 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 February 28, 2023 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 committee not authorized by a candidate shall file a post-general election report covering through the 20th day after the election no later than 30 days after the election. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(1)(iii). 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).

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<sup>1</sup> On 1/31/23, the Committee filed the 2022 Year-End Report (10/1/22 – 12/31/22). The report included the 2022 Post-General Report coverage period of 10/1/22 – 11/28/22.

## Summary of Respondents' Challenge

On April 7, 2023, the Commission received the written response (“challenge”) from the respondents requesting the Commission waive the penalty because the Committee had since filed the report. The Treasurer explained that after the Candidate’s loss in the Primary Election, the Committee converted from a principal campaign committee to a leadership PAC. Further, the Committee believed it was not required to file the 2022 Post-General Report because it did not have any activity associated with the 2022 General Election.

## Analysis

As indicated in the challenge, the Committee converted from a principal campaign committee to a leadership PAC on July 28, 2022.<sup>2</sup> As a committee not authorized by a candidate, the Committee was required to file the 2022 Post-General Report regardless of whether it made general election contributions or expenditures during the reporting period.<sup>3</sup> 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(1)(iii). While the Committee may not have been aware of the reporting requirement, the Commission appropriately notified and reminded the Committee of its requirement to file the 2022 Post-General Report on several occasions.

On October 7, 2022, the Commission’s Information Division sent the 2022 Pre-General Report Prior Notice to treasurer@compassprofessional.com and shukri.abdirahman@gmail.com. The notice included information regarding the requirement to file the 2022 Post-General Report. On November 9, 2022, the Information Division sent the 2022 Post-General Report Prior Notice detailing the requirement to file the report. On December 5, 2022, the Commission’s Electronic Filing Office (“EFO”) sent a reminder email regarding the 2022 Post-General Report to the same email addresses. On December 9, 2022, the day following the filing deadline, EFO sent a late notification email because the report had not yet been filed. On December 22, 2022, RAD sent the non-filer notification to the same email addresses because the report still had not been filed. Despite these notifications, the Committee did not disclose activity for the 2022 Post-General reporting period until filing its 2022 Year-End Report on January 31, 2023.

The Reviewing Officer confirms the Commission appropriately notified and reminded the Committee of its requirement to file the 2022 Post-General Report. Their challenge fails to address any of the three valid grounds at 11 C.F.R § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. 11 C.F.R. § 111.35(b). Failure to know filing dates is specifically included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents’ control. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$402 civil money penalty.

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<sup>2</sup> See [https://docquery.fec.gov/cgi-bin/fecimg/?\\_202207289525077147+0](https://docquery.fec.gov/cgi-bin/fecimg/?_202207289525077147+0).

<sup>3</sup> See <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2022-reporting-dates/preg-report-notice-pacs-party-committees-2022/>



**OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4534 involving Bridge PAC and Patrick Corrigan, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4534 that Bridge PAC and Patrick Corrigan, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$402 civil money penalty; and
3. Send the appropriate letter.

**Attachments**

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

**DECLARATION OF KRISTIN D. ROSER**

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission (“Commission”). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Bridge PAC:
  - A) Non-Filer Letter, dated December 22, 2022, referencing the 2022 30-Day Post-General Report (sent via electronic mail to: treasurer@compassprofessional.com and shukri.abdirahman@gmail.com);
  - B) Reason-to-Believe Letter, dated February 28, 2023, referencing the 2022 30-Day Post-General Report (sent via electronic mail to: treasurer@compassprofessional.com and shukri.abdirahman@gmail.com ).
4. I hereby certify that I have searched the Commission’s public records and find that Bridge PAC filed the 2022 Year-End Report with the Commission on January 31, 2023, which included activity covering the reporting period for the 2022 30-Day Post-General Report.
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 17<sup>th</sup> day of April, 2023.

*Kristin D. Roser*

---

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

December 22, 2022

CORRIGAN, PATRICK, TREASURER  
BRIDGE PAC  
P.O. BOX 7365  
MINNEAPOLIS, MN 55407

IDENTIFICATION NUMBER: C00790915

REFERENCE: POST-GENERAL REPORT (10/01/2022 - 11/28/2022)

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.

BRIDGE PAC

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 committee not authorized by a candidate shall file a post-general report covering through the 20<sup>th</sup> day after the election no later than 30 days after the election. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on December 8, 2022 for the 2022 Post-General Report to be timely filed.
- 3) I hereby certify that I have searched the Commission’s public records and that the documents identified herein are the true and accurate copies of:
  - a) Cover, Summary, and Detailed Summary Pages of the 2022 Year-End Report filed by Bridge PAC. The report includes the coverage period of October 1, 2022 through December 31, 2022 and was received on January 31, 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 1<sup>st</sup> day of June, 2023.

*Rhiannon Magruder*

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

# FEC FORM 3

# REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type over the lines.

12FE4M5

Bridge PAC

ADDRESS (number and street)

P.O. Box 7365

Check if different than previously reported. (ACC)

Minneapolis

MN

55407

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

C C00790915

3. IS THIS REPORT

NEW (N)

OR

AMENDED (A)

STATE ▼ DISTRICT

MN

05

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

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

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

M M

/ D D

/ Y Y Y Y

in the State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

M M

/ D D

/ Y Y Y Y

in the State of

5. Covering Period

M M

10

/ D D

01

/ Y Y Y Y

2022

through

M M

12

/ D D

31

/ Y Y Y Y

2022

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

Corrigan, Patrick, ,

Type or Print Name of Treasurer

Signature of Treasurer

Corrigan, Patrick, ,

[Electronically Filed]

Date

M M

01

/ D D

31

/ Y Y Y Y

2023

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.

Office Use Only

FEC FORM 3 (Revised 05/2016)

**SUMMARY PAGE**  
of Receipts and Disbursements

FEC Form 3 (Revised 05/2016)

PAGE 2 / 11

Write or Type Committee Name  
**Bridge PAC**

Report Covering the Period: From:  /  /  To:  /  /

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))....	860.00	126652.49
(b) Total Contribution Refunds (from Line 20(d)) .....	0.00	175.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)).....	860.00	126477.49
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17) .....	112.80	125580.36
(b) Total Offsets to Operating Expenditures (from Line 14).....	0.00	0.00
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)).....	112.80	125580.36
8. Cash on Hand at Close of Reporting Period (from Line 27).....	1132.53	
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	
10. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	

**For further information contact:**

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

POST-ELECTION DETAILED SUMMARY PAGE

Report of Receipts and Disbursements

FEC Form 3 (Revised 07/05)

PAGE 3 / 11

- If the candidate participated in the general election, use this form for the 30-day Post-General report.
- If the candidate did NOT participate in the general election, use this form for the Year-end report covering through December 31 of the election year (due on January 31).

This form is used in lieu of filling out Line Numbers 6 through 7 on Page 2 (Summary Page) and Pages 3 and 4 (the Detailed Summary Page) for the last report filed by a candidate during the current election cycle.

Write or Type Committee Name

Bridge PAC

Report Covering the Period: From: 10 / 01 / 2022 To: 12 / 31 / 2022

I. RECEIPTS

COLUMN A Total this Period

COLUMN B Election Cycle Total as of

COLUMN C Total for

11 / 08 / 2022 (date of general election)

11 / 09 / 2022 (date after general election)

through

12 / 31 / 2022 (last day of reporting period)

11. CONTRIBUTIONS

(other than loans) FROM:

- (a) Individuals/Persons Other than Political Committees
  - (i) Itemized (use Schedule A)

125.00 42285.00 0.00

(ii) Unitemized

735.00 84367.49 250.00

(iii) Total of contributions from individuals

860.00 126652.49 250.00

(b) Political Party Committees

0.00 0.00 0.00

(c) Other Political Committees

0.00 0.00 0.00



# POST-ELECTION DETAILED SUMMARY PAGE

Report of Receipts and Disbursements

FEC Form 3 (Revised 1/01)

PAGE 4 / 11

COLUMN A Total this Period	COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date)	COLUMN C Total for * (date after general election) through * (last day of reporting period) (* See page 5 for dates)
(d) The Candidate		
0.00	0.00	0.00
(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c) and (d))		
860.00	126652.49	250.00
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES		
0.00	0.00	0.00
13. LOANS:		
(a) Made or Guaranteed by the Candidate		
0.00	0.00	0.00
(b) All Other Loans		
0.00	0.00	0.00
(c) TOTAL LOANS (add Lines 13(a) and (b))		
0.00	0.00	0.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, rebates, etc.)		
0.00	0.00	0.00
15. OTHER RECEIPTS (Dividends, Interest, etc.)		
0.00	0.00	0.00
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)		
860.00	126652.49	250.00

**POST-ELECTION DETAILED SUMMARY PAGE**

Report of Receipts and Disbursements

FEC Form 3 (Revised 1/01)

PAGE 5 / 11

Write or Type Committee Name

Bridge PAC

Report Covering the Period: From:  /  /  To:  /  /

**II. DISBURSEMENTS**

	<b>COLUMN A</b> Total this Period	<b>COLUMN B</b> Election Cycle Total as of * (date of general election) (* See page 5 for date)	<b>COLUMN C</b> Total for * (date after general election) through * (last day of reporting period) (* See page 5 for dates)
17. OPERATING EXPENDITURES	<input type="text" value="112.80"/>	<input type="text" value="125580.36"/>	<input type="text" value="14.60"/>
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>
(b) Of All Other Loans	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and 19(b))	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	<input type="text" value="0.00"/>	<input type="text" value="175.00"/>	<input type="text" value="0.00"/>
(b) Political Party Committees	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>

**POST-ELECTION DETAILED SUMMARY PAGE**

Report of Receipts and Disbursements

FEC Form 3 (Revised 1/01)

PAGE 6 / 11

COLUMN A Total this Period	COLUMN B Election Cycle Total as of * (date of general election) (* See page 5 for date)	COLUMN C Total for * (date after general election) through * (last day of reporting period) (* See page 5 for dates)
-------------------------------	---	---

(c) Other Political Committees (such as PACs)

0.00	0.00	0.00
------	------	------

(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b) and (c))

0.00	175.00	0.00
------	--------	------

**21. OTHER DISBURSEMENTS**

0.00	0.00	0.00
------	------	------

**22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d) and 21)**

112.80	125755.36	14.60
--------	-----------	-------

**III. NET CONTRIBUTIONS (OTHER THAN LOANS)**

(Note: Substitute in lieu of Line #6 of Summary Page for this report only; subtract Line 20(d) from Line 11(e))

860.00	126477.49	250.00
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**IV. NET OPERATING EXPENDITURES**

(Note: Substitute in lieu of Line #7 of Summary Page for this report only; subtract Line 14 from Line 17)

112.80	125580.36	14.60
--------	-----------	-------

**V. CASH SUMMARY**

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	385.33
24. TOTAL RECIEPTS THIS PERIOD (from Line 16).....	860.00
25. SUBTOTAL (add Line 23 and Line 24).....	1245.33
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	112.80
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25)	1132.53



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 2, 2023

Patrick Corrigan, in official capacity as Treasurer  
Bridge PAC  
PO Box 7365  
Minneapolis, MN 55407

C00790915  
AF# 4534

Dear Treasurer:

On February 24, 2023, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Bridge PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2022 Post-General Report. The Commission also made a preliminary determination that the civil money penalty was \$402 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess a civil money penalty. A copy of the Reviewing Officer’s recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. 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 11:11 am, Jul 18, 2023

**SENSITIVE**FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 18, 2023

**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# 4534 – Bridge PAC and Patrick Corrigan, in their official capacity as Treasurer (C00790915)

On February 24, 2023, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2022 Post-General Report and made a preliminary determination that the civil money penalty was \$402 based on the schedule of penalties at 11 C.F.R. § 111.43. On April 7, 2023, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated June 1, 2023 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference.

The Reviewing Officer noted that as a committee not authorized by a candidate, the Committee was required to file the 2022 Post-General Report regardless of whether it made general election contributions or expenditures during the reporting period. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(1)(iii). The Reviewing Officer also confirmed the Commission appropriately notified and reminded the Committee of its requirement to file the 2022 Post-General Report. Moreover, failure to know filing dates is specifically included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents’ control. Therefore, the Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$402 civil money penalty. *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 C.F.R. § 111.36(f). To date, a response has not been received.

### **OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4534 involving Bridge PAC and Patrick Corrigan, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4534 that Bridge PAC and Patrick Corrigan, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$402 civil money penalty; and
3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) AF 4534  
 Final Determination Recommendation: )  
 Bridge PAC and Patrick Corrigan, in )  
 their official capacity as Treasurer )  
 (C00790915) )

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election

Commission, do hereby certify that on July 26, 2023, the Commission decided

by a vote of 6-0 to take the following actions in AF 4534:

1. Adopt the Reviewing Officer recommendation for AF# 4534 involving Bridge PAC and Patrick Corrigan, in their official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 4534 that Bridge PAC and Patrick Corrigan, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$402 civil money penalty.
3. Send the appropriate letter.

Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and

Weintraub voted affirmatively for the decision.

Attest:

The seal of the Federal Election Commission is circular, featuring a central eagle with wings spread, perched on a shield. The words "FEDERAL ELECTION COMMISSION" are inscribed around the top inner edge, and "UNITED STATES OF AMERICA" around the bottom inner edge. The date "July 26, 2023" is written in the center, with a horizontal line below it and the word "Date" underneath.

July 26, 2023  
 Date

**Vicktoria J Allen** Digitally signed by Vicktoria J Allen  
 Date: 2023.07.26 17:27:27 -04'00'  
 \_\_\_\_\_  
 Vicktoria J. Allen  
 Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 3, 2023

Patrick Corrigan, in official capacity as Treasurer  
Bridge PAC  
P.O. Box 7365  
Minneapolis, MN 55407

C00790915  
AF# 4534

Dear Patrick Corrigan:

On February 24, 2023, the Federal Election Commission (the “Commission”) found reason to believe (“RTB”) that Bridge PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 30-Day Post-General Report. By letter dated February 28, 2023, the Commission sent notification of the RTB finding that included a civil money penalty calculated at \$402 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On April 7, 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. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Bridge PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty in the amount of \$402 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on June 2, 2023.

On July 26, 2023, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Bridge PAC 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 \$402. It is based on the same factors used to calculate the civil money penalty at RTB. A copy of the Final Determination Recommendation is attached.

On June 7, 2023, the Commission received your \$402 payment.

If you choose to appeal the final determination, you must submit a written petition requesting that the final determination be modified or set aside. This request must be made within thirty (30) days of receipt of this letter and sent to the U.S. District Court for the district in which the committee or you reside or transact business. *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.

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

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll-free number (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,

A handwritten signature in black ink, appearing to read 'Dara Lindenbaum', with a stylized flourish at the end.

Dara Lindenbaum  
Chair