



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

December 5, 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
KDR

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

SUBJECT: Reason To Believe Recommendation – 2023 October Quarterly Report for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2023 October Quarterly Report in accordance with 52 U.S.C. § 30104(a). The October Quarterly was due on October 15, 2023.

The committees listed in the attached RTB Circulation Report either failed to file the report or filed the report [REDACTED] no more than thirty (30) days after the due date (considered a late filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

Recommendation

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a

preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.

2. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2023 OCTOBER QUARTERLY Not Election Sensitive 10/15/2023 H_S_P

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4672	C00836973	CASEY FOR CONGRESS	STEPHEN M. CASEY	JONATHAN URCAN	\$135,655	0		Not Filed	\$67,828 (est)	\$4,624
4673	C00767798	HOLLY MCCORMACK FOR CONGRESS	HOLLY MCCORMACK	HOLLY MCCORMACK	\$538,205	2		Not Filed	\$538,205 (est)	\$24,406
4674	C00809145	JONES, HERB (US HOUSE)	HERBERT CARROLL JONES, JR.	ELLA WEBSTER	\$106,406	2	11/9/2023	25	\$40,358	\$1,713
4675	C00780650	REED FOR MISSOURI	RAYMOND REED	CHRISTINA LYNCH	\$112,245	3		Not Filed	\$112,245 (est)	\$13,489

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Reason To Believe Recommendation 2023)	
October Quarterly Report for the)	
Administrative Fine Program:)	
CASEY FOR CONGRESS, and URCAN,)	AF# 4672
JONATHAN as treasurer;)	
HOLLY MCCORMACK FOR)	AF# 4673
CONGRESS, and MCCORMACK,)	
HOLLY as treasurer;)	
JONES, HERB (US HOUSE), and)	AF# 4674
WEBSTER, ELLA as treasurer;)	
REED FOR MISSOURI, and LYNCH,)	AF# 4675
CHRISTINA as treasurer;)	

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on December 07, 2023 the Commission took the following actions on the Reason To Believe Recommendation 2023 October Quarterly Report for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated December 05, 2023, on the following committees:

AF#4672 Decided by a vote of 5-0 to: (1) find reason to believe that CASEY FOR CONGRESS, and URCAN, JONATHAN 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

Federal Election Commission
Certification for Administrative Fines
December 7, 2023

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AF#4673 Decided by a vote of 5-0 to: (1) find reason to believe that HOLLY MCCORMACK FOR CONGRESS, and MCCORMACK, HOLLY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

AF#4674 Decided by a vote of 5-0 to: (1) find reason to believe that JONES, HERB (US HOUSE), and WEBSTER, ELLA 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

AF#4675 Decided by a vote of 5-0 to: (1) find reason to believe that REED FOR MISSOURI, and LYNCH, CHRISTINA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

Attest:



Vicktoria J Allen

Digitally signed by Vicktoria J
Allen
Date: 2023.12.07 17:19:43 -05'00'

Vicktoria J. Allen
Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

December 8, 2023

Christina Lynch, in official capacity as Treasurer
Reed for Missouri
PO Box 440040
Saint Louis, MO 63144

C00780650
AF#: 4675
FINE: \$13,489

Dear Christina Lynch,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an October Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period July 1, 2023 through September 30, 2023, shall be filed no later than October 15, 2023. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission (the "Commission" or "FEC") indicate that this report was not filed within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On December 7, 2023, the Commission found that there is reason to believe ("RTB") that Reed for Missouri 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, 2023. 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 \$13,489. 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 \$13,489 is due within forty (40) days of the finding, or by January 16, 2024, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: \$112,245
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 3

REED FOR MISSOURI

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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. 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 16, 2024. 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 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

REED FOR MISSOURI

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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 are true and make a final determination that Reed for Missouri 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

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.

REED FOR MISSOURI

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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,

A handwritten signature in black ink, appearing to read 'Dara Lindenbaum', with a long horizontal flourish extending to the right.

Dara Lindenbaum
Chair



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

June 17, 2024

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *DCB* for AP
Staff Director

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

Debbie Chacona *NCA for DC*
Assistant Staff Director
Reports Analysis Division

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the
2023 October Quarterly Report

Attached is a list of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2023 October Quarterly Report. The list represents 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 § 111.40, the Commission shall send a final determination notice to those respondents that have not paid the civil money penalty.

Please note, the Reports Analysis Division (RAD) recommends that the Commission take no further action against Reed for Missouri (AF 4675). On March 22, 2024, the Commission approved the recommendation to take no action against the Committee for failing to file the 2023 Year-End Report and to exclude the committee from future Administrative Fine recommendations.

Reed for Missouri (AF 4675) is the principal campaign committee ("PCC") for a first-time candidate who appeared on the ballot and lost in the 2022 Missouri Primary Election for the 2nd Congressional District held on August 2, 2022. This committee currently has five (5) outstanding

Administrative Fines (AF cases 4387, 4439, 4625, 4656, and 4667), for which the civil money penalties total \$42,080.00. AF cases 4387, 4439, and 4625 have been transferred to the U.S. Department of the Treasury for collection. [REDACTED]
[REDACTED]

The last and only report filed by the committee was the 2022 July Quarterly Report on July 20, 2022, disclosing an ending cash balance of \$40,737.44. Since then, the committee has stopped filing reports. Furthermore, the committee has neither responded to Commission requests to file, nor paid any of the assessed fines. RAD also queried the FEC database and found no receipts or disbursements associated with the committee during the 2023-2024 Election Cycle. The committee is otherwise eligible for administrative termination per the *2023-2024 RAD Review and Referral Procedures*.

RAD Recommendation

- (1) Take no further action against Reed for Missouri and its treasurer, in their official capacity, in regards to AF 4675.
- (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 Not Paid
 2023 OCTOBER QUARTERLY Not Election Sensitive 10/15/2023 H_S_P

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
4673	HOLLY MCCORMACK FOR CONGRESS	HOLLY MCCORMACK	C00767798	HOLLY MCCORMACK		Not Filed	\$538,205 (est)	2	12/07/2023	\$24,406	193	\$24,406
4674	JONES, HERB (US HOUSE)	HERBERT CARROLL JONES, JR.	C00809145	ELLA WEBSTER	11/09/2023	25	\$40,358	2	12/07/2023	\$1,713	193	\$1,713
4675	REED FOR MISSOURI	RAYMOND REED	C00780650	CHRISTINA LYNCH		Not Filed	\$112,245 (est)	3	12/07/2023	\$13,489	193	NFA

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Administrative Fine Program – Final)	
Determination Recommendation for the)	
2023 October Quarterly Report:)	
HOLLY MCCORMACK FOR)	AF# 4673
CONGRESS, and MCCORMACK,)	
HOLLY as treasurer;)	
JONES, HERB (US HOUSE), and)	AF# 4674
WEBSTER, ELLA DR. as treasurer;)	
REED FOR MISSOURI, and LYNCH,)	AF# 4675
CHRISTINA as treasurer;)	

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on July 03, 2024 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2023 October Quarterly Report, as recommended in the Reports Analysis Division's Memorandum dated June 17, 2024, on the following committees:

AF#4673 Decided by a vote of 6-0 to: (1) make a final determination that HOLLY MCCORMACK FOR CONGRESS, and MCCORMACK, HOLLY 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#4674 Decided by a vote of 6-0 to: (1) make a final determination that JONES, HERB (US HOUSE), and WEBSTER, ELLA DR. 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#4675 Decided by a vote of 6-0 to: take no further action against REED FOR MISSOURI, and LYNCH, CHRISTINA in their official capacity as treasurer. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fine
Program – Final Determination
Recommendation for the 2023 October
Quarterly Report
July 03, 2024

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Attest:

Vicktoria J Allen

Digitally signed by Vicktoria J

Allen

Date: 2024.07.03 13:04:59 -04'00'

Vicktoria J. Allen

Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

July 5, 2024

Christina Lynch, in official capacity as Treasurer
Reed for Missouri
PO Box 440040
Saint Louis, MO 63144

C00780650

AF#: 4675

Dear Christina Lynch,

On December 7, 2023, the Federal Election Commission ("the Commission" or "FEC") found reason to believe ("RTB") that Reed for Missouri and you, in your official capacity as treasurer, violated, 52 U.S.C. § 30104(a) for filing late or failing to file the 2023 October Quarterly Report. By letter dated December 8, 2023, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$13,489, in accordance with the schedule of penalties at 11 CFR § 111.43.

The Commission made a final determination on July 3, 2024 to take no further action against Reed for Missouri and you, in your official capacity as treasurer, assessed no civil money penalty, and voted to close the file.

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

If you have any questions regarding this matter, please contact Ben Holly on the toll-free number, (800) 424-9530 (at the prompt, press 5 to reach the Reports Analysis Division) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in black ink that reads "Sean J. Cooksey". The signature is written in a cursive, flowing style.

Sean J. Cooksey
Chairman