



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

March 20, 2024

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

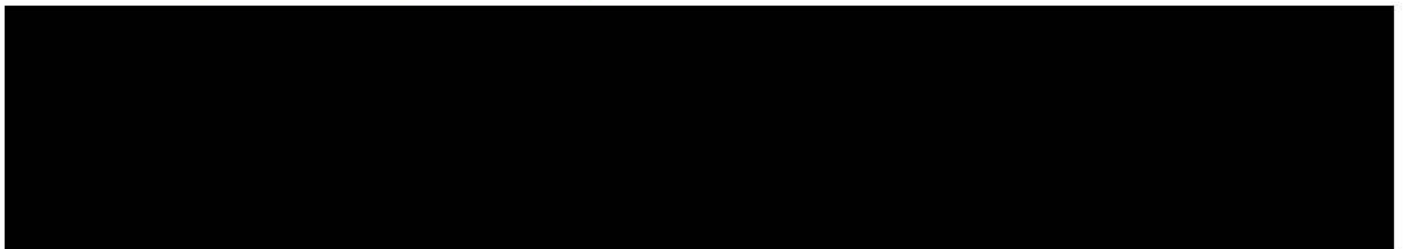
Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

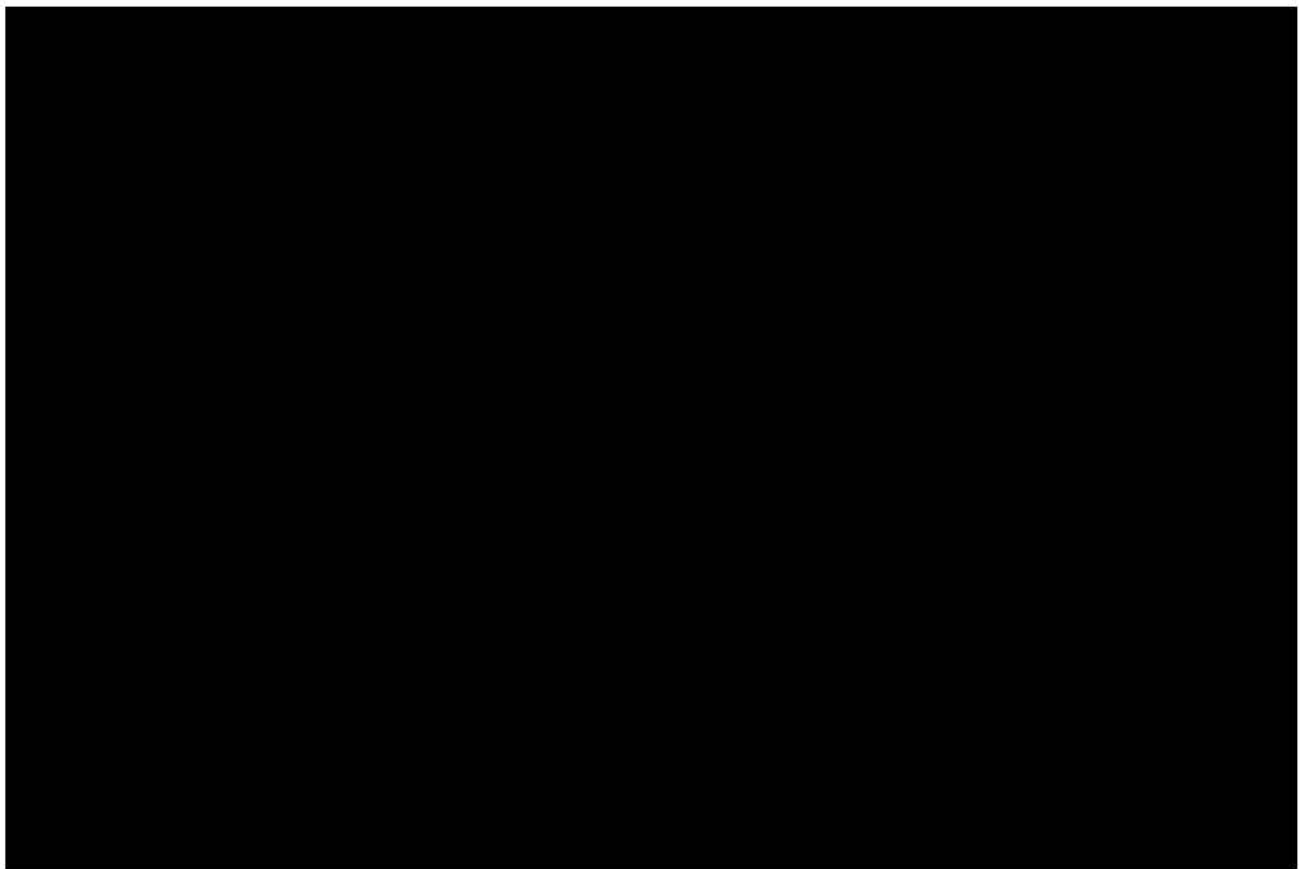
BY: *KDR BH*
Kristin D. Roser/Ben Holly
Reports Analysis Division
Compliance Branch

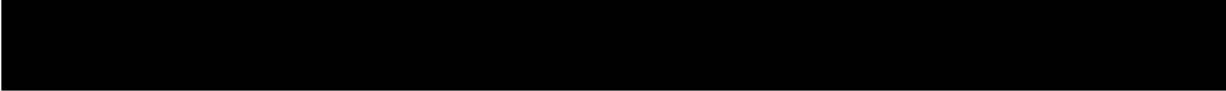
SUBJECT: Reason To Believe Recommendation – 2023 Year-End Report for the
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2023 Year-End Report in accordance with 52 U.S.C. § 30104(a). The Year-End Report was due on January 31, 2024.

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



**Recommendation**

1. A black rectangular redaction box covers the text of the first recommendation item.
2. 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.
3. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2023 YEAR-END Not Election Sensitive 01/31/2024 H_S_P_UNAUTH

| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--|-----------------------|---------------------|-----------|----|--------------|------------|-----------------|-------------|
| 4677 | C00438358 | AMSTED INDUSTRIES INCORPORATED PAC | | TRISTAN PAIGE LOPEZ | \$151,250 | 6 | 2/12/2024 | 12 | \$72,000 | \$5,320 |
| 4678 | C00790659 | CENTER STREET PAC | | MATTHEW O'BRIEN | \$145,038 | 1 | | Not Filed | \$72,519 (est) | \$5,967 |
| 4679 | C00781104 | FOR THE MANY PAC | | KINA COLLINS | \$172,872 | 0 | | Not Filed | \$172,872 (est) | \$9,725 |
| 4680 | C00837914 | FRIENDS OF ANA QUEZADA FOR CONGRESS | ANA B. QUEZADA | SATCHELL TERRY | \$175,209 | 0 | | Not Filed | \$58,403 (est) | \$4,774 |
| 4681 | C00826776 | FRONTIERS OF FREEDOM ACTION, INC. | | GEORGE LANDRITH | \$138,448 | 0 | | Not Filed | \$138,448 (est) | \$7,958 |
| 4682 | C00767798 | HOLLY MCCORMACK FOR CONGRESS | HOLLY MCCORMACK | HOLLY MCCORMACK | \$538,205 | 4 | | Not Filed | \$538,205 (est) | \$33,596 |
| 4683 | C00804500 | JOHN CONYERS FOR CONGRESS | JOHN CONYERS | OFFICE OF TREASURER | \$168,729 | 3 | | Not Filed | \$56,243 (est) | \$8,354 |
| 4684 | C00695866 | KUMAR FOR CONGRESS | RISHI KUMAR | GARY TASSER | \$244,999 | 1 | 2/16/2024 | 16 | \$196,642 | \$7,051 |
| 4685 | C00001743 | LOCAL 1814 ILA POLITICAL ACTION AND EDUCATION FUND | | FRANK AGOSTA | \$113,887 | 2 | 2/6/2024 | 6 | \$61,316 | \$1,995 |
| 4686 | C00833830 | MATT LEIV FOR ILLINOIS | MATTHEW LEIV | OFFICE OF TREASURER | \$125,643 | 0 | | Not Filed | \$41,881 (est) | \$1,497 |
| 4687 | C00830505 | PHIL ARBALLO FOR CONGRESS | PHIL ARBALLO | PAUL FAUSONE | \$134,290 | 0 | | Not Filed | \$44,763 (est) | \$1,497 |
| 4688 | C00846840 | RAJA CHAUDHRY CAMPAIGN, INC. | RAJA CHAUDHRY | LEON ZENO | \$386,570 | 0 | 3/15/2024 | *Not Filed | \$42,071 | \$1,497 |
| | | | | | | | | | | |
| 4690 | C00848879 | SHARON SAVAGE FOR SENATE | SHARON MAUREEN SAVAGE | SHARON SAVAGE | \$148,889 | 0 | 2/23/2024 | 23 | \$30,328 | \$1,112 |
| 4691 | C00833665 | SOCIAL PROGRESS IN UNION WITH ECONOMIC GROWTH | | TRINA ESTELLE | \$121,000 | 0 | 2/19/2024 | 19 | \$120,000 | \$5,258 |
| 4692 | C00236034 | WERNER ENTERPRISES INC POLITICAL ACTION COMMITTEE | | MARK MATULKA | \$167,467 | 0 | 2/6/2024 | 6 | \$44,667 | \$551 |
| 4693 | C00760488 | WOMEN'S MARCH WIN | | BAISHALI RINKU SEN | \$175,449 | 0 | 2/23/2024 | 23 | \$48,327 | \$1,112 |

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

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|----------|
| In the Matter of |) | |
| |) | |
| Reason To Believe Recommendation - 2023 |) | |
| Year-End Report for the Administrative |) | |
| Fine Program: |) | |
| AMSTED INDUSTRIES |) | AF# 4677 |
| INCORPORATED PAC, and LOPEZ, |) | |
| TRISTAN PAIGE as treasurer; |) | |
| CENTER STREET PAC, and OBRIEN, |) | AF# 4678 |
| MATTHEW as treasurer; |) | |
| FOR THE MANY PAC, and COLLINS, |) | AF# 4679 |
| KINA as treasurer; |) | |
| FRIENDS OF ANA QUEZADA FOR |) | AF# 4680 |
| CONGRESS, and TERRY, SATCHELL as |) | |
| treasurer; |) | |
| FRONTIERS OF FREEDOM ACTION, |) | AF# 4681 |
| INC., and LANDRITH, GEORGE as |) | |
| treasurer; |) | |
| HOLLY MCCORMACK FOR |) | AF# 4682 |
| CONGRESS, and MCCORMACK, |) | |
| HOLLY as treasurer; |) | |
| JOHN CONYERS FOR CONGRESS, and |) | AF# 4683 |
| OFFICE OF TREASURER as treasurer; |) | |
| KUMAR FOR CONGRESS, and TASSER, |) | AF# 4684 |
| GARY as treasurer; |) | |
| LOCAL 1814 ILA POLITICAL ACTION |) | AF# 4685 |
| AND EDUCATION FUND, and AGOSTA, |) | |
| FRANK as treasurer; |) | |
| MATT LEIV FOR ILLINOIS, and OFFICE |) | AF# 4686 |
| OF TREASURER as treasurer; |) | |
| PHIL ARBALLO FOR CONGRESS, and |) | AF# 4687 |
| FAUSONE, PAUL as treasurer; |) | |
| RAJA CHAUDHRY CAMPAIGN, INC., |) | AF# 4688 |
| and ZENO, LEON as treasurer; |) | |
| <div style="background-color: black; height: 20px; width: 100%;"></div> | | |
| SHARON SAVAGE FOR SENATE, and |) | AF# 4690 |
| SAVAGE, SHARON as treasurer; |) | |
| SOCIAL PROGRESS IN UNION WITH |) | AF# 4691 |
| ECONOMIC GROWTH, and ESTELLE, |) | |
| TRINA as treasurer; |) | |

Federal Election Commission
 Certification for Administrative Fines
 March 22, 2024

Page 2

| | | |
|---------------------------------|---|----------|
| WERNER ENTERPRISES INC |) | AF# 4692 |
| POLITICAL ACTION COMMITTEE, and |) | |
| MATULKA, MARK as treasurer; |) | |
| WOMEN'S MARCH WIN, and SEN, |) | AF# 4693 |
| BAISHALI RINKU as treasurer; |) | |

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission,
 do hereby certify that on March 22, 2024 the Commission took the following actions
 on the Reason To Believe Recommendation - 2023 Year-End Report for the
 Administrative Fine Program, as recommended in the Reports Analysis Division's
 Memorandum dated March 20, 2024, on the following committees:

AF#4677 Decided by a vote of 6-0 to: (1) find reason to believe that AMSTED INDUSTRIES INCORPORATED PAC, and LOPEZ, TRISTAN PAIGE 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#4678 Decided by a vote of 6-0 to: (1) find reason to believe that CENTER STREET PAC, and OBRIEN, MATTHEW 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#4679 Decided by a vote of 6-0 to: (1) find reason to believe that FOR THE MANY PAC, and COLLINS, KINA 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#4680 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF ANA QUEZADA FOR CONGRESS, and TERRY, SATCHELL 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#4681 Decided by a vote of 6-0 to: (1) find reason to believe that FRONTIERS OF FREEDOM ACTION, INC., and LANDRITH, GEORGE 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#4682 Decided by a vote of 6-0 to: (1) find reason to believe that HOLLY MCCORMACK FOR CONGRESS, and MCCORMACK, HOLLY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4683 Decided by a vote of 6-0 to: (1) find reason to believe that JOHN CONYERS FOR CONGRESS, and OFFICE OF TREASURER, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4684 Decided by a vote of 6-0 to: (1) find reason to believe that KUMAR FOR CONGRESS, and TASSER, GARY 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#4685 Decided by a vote of 6-0 to: (1) find reason to believe that LOCAL 1814 ILA POLITICAL ACTION AND EDUCATION FUND, and AGOSTA, FRANK 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#4686 Decided by a vote of 6-0 to: (1) find reason to believe that MATT LEIV FOR ILLINOIS, and OFFICE OF TREASURER, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard,


Federal Election Commission
Certification for Administrative Fines
March 22, 2024

Page 4

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

AF#4687 Decided by a vote of 6-0 to: (1) find reason to believe that PHIL ARBALLO FOR CONGRESS, and FAUSONE, PAUL 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#4688 Decided by a vote of 6-0 to: (1) find reason to believe that RAJA CHAUDHRY CAMPAIGN, INC., and ZENO, LEON 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#4690 Decided by a vote of 6-0 to: (1) find reason to believe that SHARON SAVAGE FOR SENATE, and SAVAGE, SHARON 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#4691 Decided by a vote of 6-0 to: (1) find reason to believe that SOCIAL PROGRESS IN UNION WITH ECONOMIC GROWTH, and ESTELLE, TRINA 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#4692 Decided by a vote of 6-0 to: (1) find reason to believe that WERNER ENTERPRISES INC POLITICAL ACTION COMMITTEE, and MATULKA, MARK 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
March 22, 2024

Page 5

AF#4693 Decided by a vote of 6-0 to: (1) find reason to believe that WOMEN'S MARCH WIN, and SEN, BAISHALI RINKU 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: 2024.03.22 16:30:44
-04'00'

Vicktoria J. Allen
Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

March 22, 2024

Office of Treasurer, in official capacity as Treasurer
John Conyers for Congress
2727 W 7 Mile Rd
Detroit, MI 48221

C00804500

AF#: 4683

FINE: \$8,354

Dear Office of Treasurer,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 2023 Year-End Report of Receipts and Disbursements every calendar year. This report, covering the period October 1, 2023 through December 31, 2023, shall be filed no later than January 31, 2024. 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 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 March 22, 2024, the Commission found that there is reason to believe ("RTB") that John Conyers 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 January 31, 2024. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$8,354. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 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 CFR § 111.34. Your payment of \$8,354 is due within forty (40) days of the finding, or by May 1, 2024, and is based on these factors:

Sensitivity of Report: Not Election Sensitive

Level of Activity: \$56,243

Number of Days Late: Not Filed

Number of Previous Civil Money Penalties Assessed: 3

JOHN CONYERS FOR CONGRESS

Page 2 of 4

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 May 1, 2024. 11 CFR § 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 CFR § 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 CFR § 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 CFR § 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 CFR § 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 CFR § 111.38.

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

JOHN CONYERS FOR CONGRESS

Page 3 of 4

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 John Conyers 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 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 CFR § 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.

JOHN CONYERS FOR CONGRESS

Page 4 of 4

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 CFR § 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 on the toll-free number, (800) 424-9530 (at the prompt, press 5 to reach the Reports Analysis Division) 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, reading "Sean J. Cooksey". The signature is written in a cursive, flowing style.

Sean J. Cooksey
Chairman

RECEIVED

By Office of the Commission Secretary at 10:17 am, Oct 01, 2024



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

October 1, 2024

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer
Staff Director *AP*

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

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the 2023 Year-End Report

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 2023 Year-End Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

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

For your information, six (6) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Center Street PAC (AF 4678) filed a Termination Report, which covered the 2023 Year-End reporting period, after the RTB finding and disclosed an actual level of activity which would

result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$0 (previously estimated to be \$72,519), thus the fine would be lowered from \$5,967 to \$0.

For the Many PAC (AF 4679) disclosed no activity after the RTB finding (previously estimated to be \$172,872), which would result in no civil money penalty (fine previously assessed to be \$9,725).

Friends of Ana Quezada (AF 4680) filed a Termination Report, which covered the 2023 Year-End reporting period, 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 \$10,299 (previously estimated to be \$58,403), thus the fine would be lowered from \$4,774 to \$832.

Frontiers of Freedom Action, Inc. (AF 4681) disclosed no activity after the RTB finding (previously estimated to be \$138,448), which would result in no civil money penalty (fine previously assessed to be \$7,958).

Kumar for Congress (AF 4684) filed the 2023 Year-End 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 \$133,907 (previously estimated to be \$196,642), thus the fine would be lowered from \$7,051 to \$5,743.

Matt Leiv for Illinois (AF 4686) filed a Termination Report on paper, which covered the 2023 Year-End reporting period, 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 \$3,421 (previously estimated to be \$41,881), thus the fine would be lowered from \$1,497 to \$415.

For your information, one (1) committee disclosed a change in treasurer after the RTB finding. An overview of this case has been provided below.

Women's March Win (AF 4693) filed an Amended Statement of Organization after the RTB finding designating Ginny Goldman as Treasurer.

RAD Recommendation

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (3) Send the appropriate letters.

Federal Election Commission
FD Circulation Report Fine Paid
2023 YEAR-END Not Election Sensitive 01/31/2024 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 |
|------|---|----------------|--------------|-------------------|--------------|-----------|----------|----|------------|-------------|---------------------|-----------|-------------|
| 4692 | WERNER ENTERPRISES INC POLITICAL ACTION COMMITTEE | | C00236034 | MARK MATULKA | 02/06/2024 | 6 | \$44,667 | 0 | 03/22/2024 | \$551 | \$551 | 4/4/2024 | \$551 |
| 4693 | WOMEN'S MARCH WIN | | C00760488 | GINNYI GOLDMAN | 02/23/2024 | 23 | \$48,327 | 0 | 03/22/2024 | \$1,112 | \$1,112 | 4/8/2024 | \$1,112 |

Federal Election Commission
FD Circulation Report Fine Not Paid
2023 YEAR-END Not Election Sensitive 01/31/2024 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 |
|------|--|-----------------------|--------------|---------------------|--------------|--------------|-----------------|----|------------|-------------|----------------|------------|
| 4677 | AMSTED INDUSTRIES INCORPORATED PAC | | C00438358 | TRISTAN PAIGE LOPEZ | 02/12/2024 | 12 | \$72,000 | 6 | 03/22/2024 | \$5,320 | 193 | \$5,320 |
| 4678 | CENTER STREET PAC | | C00790659 | MATTHEW O'BRIEN | 08/01/2024 | *Not Filed | \$0 | 1 | 03/22/2024 | \$5,967 | 193 | NONE |
| 4679 | FOR THE MANY PAC | | C00781104 | KINA COLLINS | | **Not Filed | \$0 | 0 | 03/22/2024 | \$9,725 | 193 | NONE |
| 4680 | FRIENDS OF ANA QUEZADA FOR CONGRESS | ANA B. QUEZADA | C00837914 | SATCHELL TERRY | 07/12/2024 | *Not Filed | \$10,299 | 0 | 03/22/2024 | \$4,774 | 193 | \$832 |
| 4681 | FRONTIERS OF FREEDOM ACTION, INC. | | C00826776 | GEORGE LANDRITH | | **Not Filed | \$0 | 0 | 03/22/2024 | \$7,958 | 193 | NONE |
| 4682 | HOLLY MCCORMACK FOR CONGRESS | HOLLY MCCORMACK | C00767798 | HOLLY MCCORMACK | | Not Filed | \$538,205 (est) | 4 | 03/22/2024 | \$33,596 | 193 | \$33,596 |
| 4683 | JOHN CONYERS FOR CONGRESS | JOHN CONYERS | C00804500 | OFFICE OF TREASURER | | Not Filed | \$56,243 (est) | 3 | 03/22/2024 | \$8,354 | 193 | \$8,354 |
| 4684 | KUMAR FOR CONGRESS | RISHI KUMAR | C00695866 | GARY TASSER | 02/16/2024 | 16 | \$133,907 | 1 | 03/22/2024 | \$7,051 | 193 | \$5,743 |
| 4685 | LOCAL 1814 ILA POLITICAL ACTION AND EDUCATION FUND | | C00001743 | FRANK AGOSTA | 02/06/2024 | 6 | \$61,316 | 2 | 03/22/2024 | \$1,995 | 193 | \$1,995 |
| 4686 | MATT LEIV FOR ILLINOIS | MATTHEW LEIV | C00833830 | OFFICE OF TREASURER | | ***Not Filed | \$3,421 | 0 | 03/22/2024 | \$1,497 | 193 | \$415 |
| 4687 | PHIL ARBALLO FOR CONGRESS | PHIL ARBALLO | C00830505 | PAUL FAUSONE | 04/15/2024 | *Not Filed | \$60,927 | 0 | 03/22/2024 | \$1,497 | 193 | \$1,497 |
| 4688 | RAJA CHAUDHRY CAMPAIGN, INC. | RAJA CHAUDHRY | C00846840 | LEON ZENO | 03/15/2024 | *Not Filed | \$42,071 | 0 | 03/22/2024 | \$1,497 | 193 | \$1,497 |
| 4690 | SHARON SAVAGE FOR SENATE | SHARON MAUREEN SAVAGE | C00848879 | SHARON SAVAGE | 02/23/2024 | 23 | \$30,328 | 0 | 03/22/2024 | \$1,112 | 193 | \$1,112 |

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

** The committee filed a Form 99 (Miscellaneous Electronic Submission) disclosing no activity for the 2023 Year-End reporting period.

*** Per CFR § 104.18, this committee is required to file electronic reports. The committee filed a Termination Report, covering the 2023 Year-End reporting period, on paper; therefore, the report is considered not filed. Although not considered an acceptable filing, the financial activity on the paper report was used to calculate the committee's level of activity for the reporting period.

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|--------------------------------------|---|----------|
| In the Matter of |) | |
| |) | |
| Administrative Fine Program – Final |) | |
| Determination Recommendation for the |) | |
| 2023 Year-End Report: |) | |
| AMSTED INDUSTRIES |) | AF# 4677 |
| INCORPORATED PAC, and LOPEZ, |) | |
| TRISTAN PAIGE as treasurer; |) | |
| CENTER STREET PAC, and OBRIEN, |) | AF# 4678 |
| MATTHEW as treasurer; |) | |
| FOR THE MANY PAC, and COLLINS, |) | AF# 4679 |
| KINA as treasurer; |) | |
| FRIENDS OF ANA QUEZADA FOR |) | AF# 4680 |
| CONGRESS, and TERRY, SATCHELL as |) | |
| treasurer; |) | |
| FRONTIERS OF FREEDOM ACTION, |) | AF# 4681 |
| INC., and LANDRITH, GEORGE as |) | |
| treasurer; |) | |
| HOLLY MCCORMACK FOR |) | AF# 4682 |
| CONGRESS, and MCCORMACK, |) | |
| HOLLY as treasurer; |) | |
| JOHN CONYERS FOR CONGRESS, and |) | AF# 4683 |
| OFFICE OF TREASURER; |) | |
| KUMAR FOR CONGRESS, and TASSER, |) | AF# 4684 |
| GARY as treasurer; |) | |
| LOCAL 1814 ILA POLITICAL ACTION |) | AF# 4685 |
| AND EDUCATION FUND, and AGOSTA, |) | |
| FRANK as treasurer; |) | |
| MATT LEIV FOR ILLINOIS, and OFFICE |) | AF# 4686 |
| OF TREASURER; |) | |
| PHIL ARBALLO FOR CONGRESS, and |) | AF# 4687 |
| FAUSONE, PAUL as treasurer; |) | |
| RAJA CHAUDHRY CAMPAIGN, INC., |) | AF# 4688 |
| and ZENO, LEON as treasurer; |) | |
| SHARON SAVAGE FOR SENATE, and |) | AF# 4690 |
| SAVAGE, SHARON as treasurer; |) | |
| WERNER ENTERPRISES INC | | AF# 4692 |
| POLITICAL ACTION COMMITTEE, and | | |
| MATULKA, MARK as treasurer; | | |
| WOMEN'S MARCH WIN, and |) | AF# 4693 |
| GOLDMAN, GINNYI as treasurer; |) | |

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on October 02, 2024 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2023 Year-End Report, as recommended in the Reports Analysis Division's Memorandum dated October 01, 2024, on the following committees:

AF#4677 Decided by a vote of 6-0 to: (1) make a final determination that AMSTED INDUSTRIES INCORPORATED PAC, and LOPEZ, TRISTAN PAIGE 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#4678 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 will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4679 Decided by a vote of 6-0 to: (1) make a final determination that FOR THE MANY PAC, and COLLINS, KINA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed the a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4680 Decided by a vote of 6-0 to: (1) make a final determination that FRIENDS OF ANA QUEZADA FOR CONGRESS, and TERRY, SATCHELL 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#4681 Decided by a vote of 6-0 to: (1) make a final determination that FRONTIERS OF FREEDOM ACTION, INC., and LANDRITH, GEORGE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4682 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#4683 Decided by a vote of 6-0 to: (1) make a final determination that JOHN CONYERS FOR CONGRESS, and OFFICE OF TREASURER violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4684 Decided by a vote of 6-0 to: (1) make a final determination that KUMAR FOR CONGRESS, and TASSER, GARY 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#4685 Decided by a vote of 6-0 to: (1) make a final determination that LOCAL 1814 ILA POLITICAL ACTION AND EDUCATION FUND, and AGOSTA, FRANK 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#4686 Decided by a vote of 6-0 to: (1) make a final determination that MATT LEIV FOR ILLINOIS, and OFFICE OF TREASURER, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4687 Decided by a vote of 6-0 to: (1) make a final determination that PHIL ARBALLO FOR CONGRESS, and FAUSONE, PAUL 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#4688 Decided by a vote of 6-0 to: (1) make a final determination that RAJA CHAUDHRY CAMPAIGN, INC., and ZENO, LEON 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
October 2, 2024

Page 4

AF#4690 Decided by a vote of 6-0 to: (1) make a final determination that SHARON SAVAGE FOR SENATE, and SAVAGE, SHARON 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#4692 Decided by a vote of 6-0 to: (1) make a final determination that WERNER ENTERPRISES INC POLITICAL ACTION COMMITTEE, and MATULKA, MARK 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#4693 Decided by a vote of 6-0 to: (1) make a final determination that WOMEN'S MARCH WIN, and GOLDMAN, GINNYI in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

Attest:

**Vicktoria J Allen**

Digitally signed by Vicktoria J
Allen
Date: 2024.10.03 19:19:09 -04'00'

Vicktoria J. Allen
Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

October 7, 2024

Office of Treasurer, in official capacity as Treasurer
John Conyers for Congress
2727 W 7 Mile Rd
Detroit, MI 48221

C00804500

AF#: 4683
FINE: \$8,354

Dear Office of Treasurer,

On March 22, 2024, the Federal Election Commission (the "Commission" or "FEC") found reason to believe ("RTB") that John Conyers 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 2023 Year-End Report. By letter dated March 22, 2024, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$8,354, in accordance with the schedule of penalties at 11 CFR § 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. You must also file the Year-End Report if you have not already done so.

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 October 2, 2024 that John Conyers 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 \$8,354, in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive
Level of Activity: \$56,243
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 3

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

JOHN CONYERS FOR CONGRESS

Page 2 of 4

If you choose to appeal the final determination, you must submit a written petition, 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 CFR § 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 the receiving the debt. Treasury currently charges a fee of 30 percent 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 percent 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

JOHN CONYERS FOR CONGRESS

Page 3 of 4

bank account, or by debit or credit card through Pay.gov, the federal government's secure 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 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 the payment of the civil money penalty, 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, reading "Sean J. Cooksey". The signature is written in a cursive, flowing style.

Sean J. Cooksey
Chairman

JOHN CONYERS FOR CONGRESS

Page 4 of 4