



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**SENSITIVE**

June 4, 2024

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Reason To Believe Recommendation – 2024 April Quarterly Report for the  
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2024 April Quarterly Report in accordance with 52 U.S.C. § 30104(a). The April Quarterly Report was due on April 15, 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. 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  
2024 APRIL QUARTERLY Not Election Sensitive 04/15/2024 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4702	C00798355	AGENDA PAC		TARIEM BURROUGHS	\$320,044	0	5/15/2024	30	\$75,625	\$6,046
4703	C00832675	AGWAN FOR CONGRESS	PERVEZ S. AGWAN	PERVEZ AGWAN	\$3,471,145	0	5/8/2024	23	\$508,843	\$12,540
4704	C00571398	BLAKPAC		CARL A. MARBURY	\$120,058	0		Not Filed	\$60,029 (est)	\$4,774
4705	C00832873	CAROLINE KANE FOR CONGRESS	CAROLINE KANE	LORETTA PATEK	\$121,894	0	5/1/2024	16	\$17,645	\$274
4706	C00790659	CENTER STREET PAC		MATTHEW O'BRIEN	\$145,038	1		Not Filed	\$72,519 (est)	\$5,967
4707	C00857433	COMMANDER JAY FURMAN FOR CONGRESS	JAY FURMAN	PETER HALLER	\$364,540	0	5/16/2024	*Not Filed	\$49,955	\$1,497
4708	C00838938	DENNIS BAKER FOR CONGRESS	DENNIS BAKER	DENNIS BAKER	\$106,970	0	4/28/2024	13	\$41,611	\$782
4709	C00858670	FIGHTING 4 ONE AMERICA PAC		DEREK LEWIS	\$148,000	0		Not Filed	\$148,000 (est)	\$7,958
4710	C00781104	FOR THE MANY PAC		KINA COLLINS	\$172,872	1		Not Filed	\$172,872 (est)	\$12,156
4711	C00826776	FRONTIERS OF FREEDOM ACTION, INC.		GEORGE LANDRITH	\$138,448	0		Not Filed	\$138,448 (est)	\$7,958
4712	C00767798	HOLLY MCCORMACK FOR CONGRESS	HOLLY MCCORMACK	HOLLY MCCORMACK	\$538,205	4		Not Filed	\$538,205 (est)	\$33,596
4713	C00852152	JENNIFER ADAMS FOR CONGRESS	JENNIFER ADAMS	J. ADAMS	\$146,972	0	4/24/2024	9	\$69,448	\$1,729
4714	C00804500	JOHN CONYERS FOR CONGRESS	JOHN CONYERS	OFFICE OF TREASURER	\$168,729	3		Not Filed	\$56,243 (est)	\$8,354
4715	C00720573	LOVE FOR TEXAS	JOHN BENARD LOVE III	DAPHNE TENORIO	\$110,563	0		Not Filed	\$22,113 (est)	\$832
4716	C00833830	MATT LEIV FOR ILLINOIS	MATTHEW LEIV	OFFICE OF TREASURER	\$125,643	0		Not Filed	\$41,881 (est)	\$1,497
4717	C00853945	MERIKA COLEMAN FOR CONGRESS	MERIKA COLEMAN	DEANNA REED	\$252,048	0		Not Filed	\$126,024 (est)	\$7,958
4718	C00839845	PHILLIP DRAKE UNITING AMERICA 2024	PHILLIP JOSEPH DRAKE	PHIL DRAKE	\$1,028,200	0		Not Filed	\$342,733 (est)	\$14,146
4719	C00765909	PULLIAM'S COMMITTEE	ALANDER PULLIAM	TAKARI GREEN	\$2,145,742	1	5/5/2024	20	\$2,300	\$202
4720	C00846840	RAJA CHAUDHRY CAMPAIGN, INC.	RAJA CHAUDHRY	LEON ZENO	\$386,570	0		Not Filed	\$193,285 (est)	\$9,725
4721	C00846063	SANTOS LIMON FOR CONGRESS	SANTOS M. LIMON	SANTOS LIMON	\$173,817	0		Not Filed	\$57,939 (est)	\$4,774
4722	C00847004	SARAH GAD FOR U.S. CONGRESS	SARAH GAD	DANTE DESERANNO	\$139,072	0		Not Filed	\$69,536 (est)	\$4,774

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4723	C00848879	SHARON SAVAGE FOR SENATE	SHARON MAUREEN SAVAGE	SHARON SAVAGE	\$148,889	0		Not Filed	\$74,445 (est)	\$4,774
4724	C00784983	TAMIE WILSON FOR US	TAMARA WILSON	CYNTHIA BROWN	\$1,104,421	2	5/4/2024	19	\$154,266	\$9,649
4725	C00437525	TEXAS SPINE AND JOINT LTD PAC		ANTHONY WAHL	\$191,891	0	4/22/2024	7	\$37,756	\$584
4726	C00418889	TRAVIS COUNTY REPUBLICAN PARTY FEDERAL COMMITTEE		JOSEPH WALTER	\$343,231	0	4/25/2024	10	\$28,703	\$683

\* 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 - 2024	)	
April Quarterly Report for the	)	
Administrative Fine Program:	)	
AGENDA PAC, and BURROUGHS,	)	AF# 4702
TARIEM as treasurer;	)	
AGWAN FOR CONGRESS, and AGWAN,	)	AF# 4703
PERVEZ as treasurer;	)	
BLAKPAC, and MARBURY, CARL A as	)	AF# 4704
treasurer;	)	
CAROLINE KANE FOR CONGRESS, and	)	AF# 4705
PATEK, LORETTA as treasurer;	)	
CENTER STREET PAC, and OBRIEN,	)	AF# 4706
MATTHEW as treasurer;	)	
COMMANDER JAY FURMAN FOR	)	AF# 4707
CONGRESS, and HALLER, PETER as	)	
treasurer;	)	
DENNIS BAKER FOR CONGRESS, and	)	AF# 4708
BAKER, DENNIS as treasurer;	)	
FIGHTING 4 ONE AMERICA PAC, and	)	AF# 4709
LEWIS, DEREK as treasurer;	)	
FOR THE MANY PAC, and COLLINS,	)	AF# 4710
KINA as treasurer;	)	
FRONTIERS OF FREEDOM ACTION,	)	AF# 4711
INC., and LANDRITH, GEORGE as	)	
treasurer;	)	
HOLLY MCCORMACK FOR	)	AF# 4712
CONGRESS, and MCCORMACK,	)	
HOLLY as treasurer;	)	
JENNIFER ADAMS FOR CONGRESS,	)	AF# 4713
and ADAMS, J as treasurer;	)	
JOHN CONYERS FOR CONGRESS, and	)	AF# 4714
OFFICE OF TREASURER;	)	
LOVE FOR TEXAS, and TENORIO,	)	AF# 4715
DAPHNE as treasurer;	)	
MATT LEIV FOR ILLINOIS, and OFFICE	)	AF# 4716
OF TREASURER;	)	
MERIKA COLEMAN FOR CONGRESS,	)	AF# 4717
and REED, DEANNA as treasurer;	)	
PHILLIP DRAKE UNITING AMERICA	)	AF# 4718
2024, and DRAKE, PHIL as treasurer;	)	

Federal Election Commission  
 Certification for Administrative Fines  
 June 6, 2024

Page 2

PULLIAM'S COMMITTEE, and GREEN,	)	AF# 4719
TAKARI as treasurer;	)	
RAJA CHAUDHRY CAMPAIGN, INC.,	)	AF# 4720
and ZENO, LEON as treasurer;	)	
SANTOS LIMON FOR CONGRESS, and	)	AF# 4721
LIMON, SANTOS as treasurer;	)	
SARAH GAD FOR U.S. CONGRESS, and	)	AF# 4722
DESERANNO, DANTE as treasurer;	)	
SHARON SAVAGE FOR SENATE, and	)	AF# 4723
SAVAGE, SHARON as treasurer;	)	
TAMIE WILSON FOR US, and BROWN,	)	AF# 4724
CYNTHIA as treasurer;	)	
TEXAS SPINE AND JOINT LTD PAC,	)	AF# 4725
and ANTHONY WAHL as treasurer;	)	
TRAVIS COUNTY REPUBLICAN	)	AF# 4726
PARTY FEDERAL COMMITTEE, and	)	
WALTER, JOSEPH as treasurer;	)	

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission,  
 do hereby certify that on June 06, 2024 the Commission took the following actions on  
 the Reason To Believe Recommendation - 2024 April Quarterly Report for the  
 Administrative Fine Program, as recommended in the Reports Analysis Division's  
 Memorandum dated June 04, 2024, on the following committees:

AF#4702      Decided by a vote of 5-0 to: (1) find reason to believe that AGENDA PAC,  
 and BURROUGHS, TARIEM 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#4703 Decided by a vote of 5-0 to: (1) find reason to believe that AGWAN FOR CONGRESS, and AGWAN, PERVEZ 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#4704 Decided by a vote of 5-0 to: (1) find reason to believe that BLAKPAC, and MARBURY, CARL A in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

AF#4705 Decided by a vote of 5-0 to: (1) find reason to believe that CAROLINE KANE FOR CONGRESS, and PATEK, LORETTA 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#4706 Decided by a vote of 5-0 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

AF#4707 Decided by a vote of 5-0 to: (1) find reason to believe that COMMANDER JAY FURMAN FOR CONGRESS, and HALLER, PETER 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#4708 Decided by a vote of 5-0 to: (1) find reason to believe that DENNIS BAKER FOR CONGRESS, and BAKER, DENNIS 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  
June 6, 2024

Page 4

AF#4709 Decided by a vote of 5-0 to: (1) find reason to believe that FIGHTING 4 ONE AMERICA PAC, and LEWIS, DEREK 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#4710 Decided by a vote of 5-0 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

AF#4711 Decided by a vote of 5-0 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

AF#4712 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#4713 Decided by a vote of 5-0 to: (1) find reason to believe that JENNIFER ADAMS FOR CONGRESS, and ADAMS, J 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#4714 Decided by a vote of 5-0 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.



Federal Election Commission  
Certification for Administrative Fines  
June 6, 2024

Page 5

AF#4715 Decided by a vote of 5-0 to: (1) find reason to believe that LOVE FOR TEXAS, and TENORIO, DAPHNE 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#4716 Decided by a vote of 5-0 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, Cooksey, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

AF#4717 Decided by a vote of 5-0 to: (1) find reason to believe that MERIKA COLEMAN FOR CONGRESS, and REED, DEANNA 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#4718 Decided by a vote of 5-0 to: (1) find reason to believe that PHILLIP DRAKE UNITING AMERICA 2024, and DRAKE, PHIL 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#4719 Decided by a vote of 5-0 to: (1) find reason to believe that PULLIAM'S COMMITTEE, and GREEN, TAKARI 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#4720 Decided by a vote of 5-0 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

Federal Election Commission  
Certification for Administrative Fines  
June 6, 2024

Page 6

AF#4721 Decided by a vote of 5-0 to: (1) find reason to believe that SANTOS LIMON FOR CONGRESS, and LIMON, SANTOS 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#4722 Decided by a vote of 5-0 to: (1) find reason to believe that SARAH GAD FOR U.S. CONGRESS, and DESERANNO, DANTE 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#4723 Decided by a vote of 5-0 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, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Dickerson did not vote.

AF#4724 Decided by a vote of 5-0 to: (1) find reason to believe that TAMIE WILSON FOR US, and BROWN, CYNTHIA 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#4725 Decided by a vote of 5-0 to: (1) find reason to believe that TEXAS SPINE AND JOINT LTD PAC, and ANTHONY WAHL 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#4726 Decided by a vote of 5-0 to: (1) find reason to believe that TRAVIS COUNTY REPUBLICAN PARTY FEDERAL COMMITTEE, and WALTER, JOSEPH 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  
June 6, 2024

Page 7



Attest:

**Vicktoria J  
Allen**

Digitally signed by Vicktoria J  
Allen  
Date: 2024.06.06 18:49:43  
-04'00'

---

Vicktoria J. Allen  
Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

AF

June 10, 2024

Takari Green, in official capacity as Treasurer  
Pulliam's Committee  
1800 Vine St  
Los Angeles, CA 90028

C00765909

AF#: 4719

FINE: \$202

Dear Takari Green,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an April Quarterly Report of Receipts and Disbursements. This report, covering the period January 1, 2024 through March 31, 2024, shall be filed no later than April 15, 2024. 52 U.S.C. § 30104(a). Records at the Federal Election Commission (the "Commission" or "FEC") indicate that this report was filed on May 5, 2024, 20 days late.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On June 6, 2024, the Commission found that there is reason to believe ("RTB") that Pulliam's Committee 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 April 15, 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 \$202. 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 \$202 is due within forty (40) days of the finding, or by July 16, 2024, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$2,300  
Number of Days Late: 20  
Number of Previous Civil Money Penalties Assessed: 1

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**

## PULLIAM'S COMMITTEE

Page 2 of 4

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 July 16, 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](mailto:administrativefines@fec.gov). The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the date they are electronically received by staff.

In addition, if you intend to be represented by counsel, please advise the Office of

## PULLIAM'S COMMITTEE

Page 3 of 4

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 Pulliam's Committee 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.

### **Settlement Offers**

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

## PULLIAM'S COMMITTEE

Page 4 of 4

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 on the toll-free number, (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,

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

Sean J. Cooksey  
Chairman



**From:** [Rhiannon Magruder](#)  
**To:** [FEC Administrative Fines](#)  
**Subject:** FW: Pulliam's Committee: Possible AF Challenge  
**Date:** Friday, July 12, 2024 9:12:22 AM

---

**From:** Alander Pulliam <[alanderpulliam.com](mailto:alanderpulliam.com)>  
**Sent:** Tuesday, June 25, 2024 3:33 PM  
**To:** Nataliya Ioffe <[Nloffe@fec.gov](mailto:Nloffe@fec.gov)>  
**Subject:** FCC

Federal Election Commission 1100 New York Avenue NW Washington, D.C. 20463

Dear Federal Election Commission:

Re: Federal Election Campaign Act of 1971, as amended - Civil Money Penalty

I am writing in response to the Federal Election Commission's (FEC) finding that Pulliam's Committee, of which I am the treasurer, failed to file a timely April Quarterly Report of Receipts and Disbursements for the period January 1, 2024 through March 31, 2024. The report was filed on May 5, 2024, which is 20 days late.

Pursuant to 52 U.S.C. § 30101 et seq. and 11 C.F.R. § 111.43, I respectfully request a review of the FEC's finding and the associated civil money penalty of \$202.

In support of our request for review, I submit that the circumstances surrounding our failure to file a timely report were extraordinary and unforeseen. Specifically:

The committee's inactivity during the reporting period resulted in no contributions or distributions.  
Unforeseen circumstances prevented timely filing, including the health issues experienced by Alander Pulliam, the committee's treasurer, [REDACTED] and was unable to devote sufficient time to managing the committee's finances.  
The committee cooperated with the FEC and promptly filed the report once Mr. Pulliam's health issues had been resolved.

In light of these mitigating factors, we respectfully request that you consider a more reasonable penalty taking into account the unique circumstances surrounding our failure to file a timely report.

Thank you for your attention to this matter.

Sincerely,

Treasurer, Pulliam's Committee

The email you receive from ABM Credit Union, including any attachments, may contain confidential and/or privileged information for the intended recipient(s) only and the sender does not waive any related legal rights or privilege. Any use or disclosure of the information by an unintended recipient is unauthorized and prohibited. If you have received an email message in error, please delete the entire message, including attachments if any, and inform us by return email.

ABM Credit Union cannot guarantee that the email you received was sent by ABM Credit Union. If you have any doubts about the authenticity of an email from ABM Credit Union, please [contact us](#) immediately.

It is also important to check for viruses and defects before opening or using attachments. ABM Credit Union accepts no liability for loss or damage arising from the receipt or use of any email transmission.

ABM Credit Union is committed to providing customers with a secure and protected banking environment. Learn about what we do and how you can protect yourself.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

August 7, 2024

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

AF# 4719 – Pulliam’s Committee and Peter Kessler<sup>1</sup>, in their official capacity as Treasurer (C00765909)

### **Summary of Recommendation**

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$202 civil money penalty.

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

The 2024 April Quarterly Report was due on April 15, 2024. The respondents filed the report on May 5, 2024, 20 days late. The report is not election sensitive and was filed within 30 days of the due date; therefore, the report is considered late. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On June 6, 2024, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2024 April Quarterly Report and made a preliminary determination that the civil money penalty was \$202 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 RAD on June 10, 2024 to notify them of the Commission’s RTB finding and civil money penalty.

### **Legal Requirements**

The Federal Election Campaign Act (“Act”) states that the treasurer of a principal campaign committee of a candidate for the office of President shall file a quarterly report for the period ending March 30 no later than April 15. 52 U.S.C. § 30104(a)(3) and 11 C.F.R. § 104.5(b)(1)(ii). 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).

---

<sup>1</sup> On 7/17/24, the Committee filed an Amended Statement of Organization (“FEC Form 1”) to change the Treasurer to Peter Kessler. The respondents in this matter have been updated accordingly. See [202407179661212803.pdf \(fec.gov\)](https://www.fec.gov/disclosure/202407179661212803.pdf).

## Summary of Respondents' Challenge

On June 10, 2024, the Commission received the written response (“challenge”) from the Committee stating that the Committee was inactive during the reporting period with no contributions or disbursements. Further, the Committee states that it experienced unforeseen circumstances when the Treasurer, Alander Pulliam, experienced health issues and “...was unable to devote sufficient time to managing the committee’s finances.” The Committee also notes that once Mr. Pulliam’s health issues were resolved, the Committee worked with the FEC to file the report.

## Analysis

The Committee suggests it had no financial activity during the 2024 April Quarterly reporting period. The Reviewing Officer notes that the level of activity is defined as “the total amount of receipts and disbursements for the period covered by the late report.” 11 C.F.R. § 111.43(d)(3)(i). The Committee’s 2024 April Quarterly Report disclosed \$2,300 in total receipts and \$0 in total disbursements for the reporting period. Therefore, the Reviewing Officer confirms the level of activity is \$2,300. Using the schedule of penalties at 11 C.F.R. § 111.43(a) for the level of activity bracket of \$1 - \$4,999.99, the civil money penalty is  $[\$42 + (\$6 \times 20 \text{ days late})] \times [1 + (.25 \times 1 \text{ previous violation}^2)]$  or \$202. The Reviewing Officer confirms the penalty was correctly calculated at RTB.

The Committee also states that Alander Pulliam’s health issues resulted in the late filing of the 2024 April Quarterly Report. While the challenge refers to Mr. Pulliam as the Committee’s Treasurer, Commission records indicate Mr. Pulliam is the Candidate<sup>3</sup> and has never officially served in the capacity as Treasurer.<sup>4</sup> The Reviewing Officer is sympathetic to the Candidate’s illness and its potential impact on Committee operations. However, a committee’s treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d). Moreover, illness and unavailability of a treasurer or committee staff are specifically included at 11 C.F.R. § 111.35(d) as examples of circumstances that will not be considered reasonably unforeseen and beyond the respondents’ control.

The challenge fails to adequately 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

---

<sup>2</sup> See 11 C.F.R. § 111.43(d)(4). In [AF 4375](#), the Committee was assessed a penalty for failing to timely file the 2022 July Quarterly Report.

<sup>3</sup> See [PULLIAM, ALANDER - Candidate overview | FEC](#).

<sup>4</sup>At the time the 2024 April Quarterly Report was due, Takari Green was designated as the Committee’s Treasurer. On 10/13/22, the Committee filed an Amended FEC Form 1 to designate Takari Green as the Committee’s Treasurer. See [202210139532198205.pdf \(fec.gov\)](#). The Committee next filed an Amended FEC Form 1 on 7/17/24, designating Peter Kessler as the Committee’s Treasurer. See Footnote 1. Since 10/13/22, the Committee’s FEC Form 1 has disclosed its official email address as [alanderpulliam.com](mailto:alanderpulliam.com). The Reviewing Officer confirms the Commission appropriately emailed the Committee regarding its requirement to file the 2024 April Quarterly Report on multiple occasions before and after the filing deadline. See Attachments 2 and 3.

control and they filed the report no later than 24 hours after the end of these circumstances. 11 C.F.R. § 111.35(b). 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 \$202 civil money penalty.

### **OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4719 involving Pulliam's Committee and Peter Kessler, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4719 that Pulliam's Committee and Peter Kessler, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$202 civil money penalty; and
3. Send the appropriate letter.

### **Attachments**

Attachment 1 –

Attachment 2 –

Attachment 3 – Declaration from RAD

Attachment 4 – 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 RAD’s Filing Notification System to Pulliam’s Committee’s official email address of record and any email address(es) entered by the Committee when uploading electronic reports in the last year:
  - A) Filing Reminder email, dated April 10, 2024, referencing the 2024 April Quarterly Report (sent via electronic mail to: alander@alanderpulliam.com and alander@runforwe.org);
  - B) Late Notification email, dated April 16, 2024, referencing the 2024 April Quarterly Report (sent via electronic mail to: alander@alanderpulliam.com and alander@runforwe.org).
4. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Pulliam’s Committee’s official email address of record:
  - A) Non-filer Notice, dated April 30, 2024, referencing the 2024 April Quarterly Report (sent via electronic mail to: Committee’s email address (alander@alanderpulliam.com));

B) Reason-to-Believe Letter, dated June 10, 2024, referencing the 2024 April Quarterly Report (sent via electronic mail to: [alanderpulliam.com](mailto:alanderpulliam.com)).

5. I hereby certify that I have searched the Commission's public records and find that Pulliam's Committee filed the 2024 April Quarterly Report with the Commission on May 5, 2024.
6. 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 22nd day of July, 2024.

*Kristin D. Roser*

---

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



From: [fec@fec.gov](mailto:fec@fec.gov)  
 To: [Reports Analysis Division \(RAD\) Staff](mailto:Reports Analysis Division (RAD) Staff); [Barbara Tammaro@fec.gov](mailto:Barbara Tammaro@fec.gov); [Paul Kovach@fec.gov](mailto:Paul Kovach@fec.gov); [Hemalatha Suryan@fec.gov](mailto:Hemalatha Suryan@fec.gov)  
 Subject: FEC Report Due 4/15 (April Quarterly - Presidential Committees)  
 Date: Wednesday, April 10, 2024 11:52:22 AM

## Federal Election Commission Reminder Email

04/10/2024

Dear Filer,

The Federal Election Commission (FEC) would like to remind you that the 2024 April Quarterly Report is due on April 15, 2024 for candidate committees. Newly registered campaign committees that have not raised or spent more than \$5,000 by the ending coverage date of the April Quarterly Report do not need to file this report (we encourage these committees to file a statement with the FEC to clarify for the public record that the committee has not met the \$5,000 reporting threshold). If you have already filed this report, please disregard this email. For more information regarding your filing schedule, visit: <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/>.

Electronic filers have until 11:59 PM (ET) on Monday, April 15 to submit their April Quarterly Report on time. Staff in the Reports Analysis Division (RAD) and Electronic Filing Office will be available until 8:00 PM (ET) on Monday, April 15 to answer questions regarding the content and filing of reports. However, due to the high volume of calls and extended wait times close to the deadline, we encourage you to file early.

To reach the Reports Analysis Division (RAD), for help with reporting questions and issues, call 1-800-424-9530 (press 5) or 202-694-1130. For help with technical issues relating to FECFile or electronic filing, dial the same toll-free number and press 4 or call 202-694-1307. You may also look up the name and contact information of your committee's assigned campaign finance analyst or submit a question to your assigned analyst online at <https://www.fec.gov/help-candidates-and-committees/question-rad/>. Please also visit: <https://www.fec.gov/help-candidates-and-committees/> for helpful information, such as reporting examples.

Help for electronic filers is available at: <https://www.fec.gov/help-candidates-and-committees/filing-reports/electronic-filing/>. Assistance with FECFile, including a User Manual, can be found at: <https://www.fec.gov/help-candidates-and-committees/filing-reports/fecfile-software/>. If you need to obtain or update your electronic filing password, please visit: <https://webforms.fec.gov/pse/getstarted.htm>.

Thank You,

Federal Election Commission (FEC)

This email was sent to: @ToAddress

Your Committee ID at FEC: @FECComteld

FEC-@FECEmailNumber

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

## Reminder Email Committee List

#	COMMITTEE ID	COMMITTEE NAME	ANALYST NAME	EMAIL ADDRESSES
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
32				
33				
34				
35				
36				
37				
38				
39				
40				
41				
42				
43				
44				
45				
46				
47				
48				
49				
50				
51				
52				
53				
54				
55				
56				
57				
58				
59				
60				
61				
62				
63				
64				
65				
66				
67				
68				
69				
70				
71				
72				
73				
74				
75				
76				
77				
78				
79				
80				
81				
82				
83				
84				
85				
86				
87				
88				
89				
90				
91				
92				
93				
94				
95				
96				
97				
98				
99				
100				



<input type="text"/>	<input type="text"/>
----------------------	----------------------

04/16/2024

---

Dear Filer,

Committee ID	@FECComteid
Report Type	April Quarterly
Due Date	April 15, 2024
Close of Books	March 31, 2024

Our records indicate that you may have been required to file the above report. However, it appears that we did not receive the report electronically from you. If you believe you have filed this report or have questions about whether you should be filing this report, please call the Federal Election Commission's Reports Analysis Division at (202) 694-1130 or (800) 424-9530, and press 5. You may also look up your committee's assigned campaign finance analyst or submit a question to your assigned analyst online at <https://www.fec.gov/help-candidates-and-committees/question-rad>.

If you need assistance in submitting your report electronically, please call (202) 694-1307 or (800) 424-9530, and press 4 for the Electronic Filing Office.

Newly registered campaign committees that have not raised or spent more than \$5,000 by the ending coverage date of the April Quarterly do not need to file this report (we encourage these committees to file a statement with the FEC to clarify for the public record that the committee has not met the \$5,000 reporting threshold).

**Please do not reply to this notice. It is sent from an unattended account that cannot receive email.**

Thank you,

Federal Election Commission

---

This e-mail is intended only for the use of the Committee/Filer designated as recipient.

[illegible]





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

RQ-7

April 30, 2024

GREEN, TAKARI, TREASURER  
PULLIAM'S COMMITTEE  
1800 VINE ST  
LOS ANGELES, CA 90028

IDENTIFICATION NUMBER: C00765909

REFERENCE: APRIL QUARTERLY REPORT (01/01/2024 - 03/31/2024)

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 with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20463. For reports shipped via delivery services (e.g., FedEx, UPS or DHL), use the ZIP code 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 this report may result in civil money penalties, suspension of matching funds payments, 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. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Jacqueline Gausepohl in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1277.

PULLIAM'S COMMITTEE

Page 2 of 2

Sincerely,

A handwritten signature in black ink that reads "Debbie Chacona". The script is cursive and fluid.

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) Political committees authorized by a candidate for the office of President shall file a quarterly report for the period ending March 31 no later than April 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on April 15, 2024 for the 2024 April Quarterly 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 Page, Summary Page, and Detailed Summary Pages of the 2024 April Quarterly Report filed by Pulliam's Committee. The report includes the coverage period of January 1, 2024 through March 31, 2024 and was electronically filed on May 5, 2024.
- 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 6th day of August, 2024.

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



**FEC  
FORM 3P****REPORT OF RECEIPTS  
AND DISBURSEMENTS**BY AN AUTHORIZED COMMITTEE OF A CANDIDATE  
FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT

Office Use Only

**1. NAME OF COMMITTEE** (in full, type or print)

Example: If typing, type over the lines.

12FE4M5

PULLIAM'S COMMITTEE

**ADDRESS** (number and street)

1800 VINE ST

Check if different  
than previously  
reported. (ACC)

LOS ANGELES

CITY

CA

STATE

90028

ZIP CODE

**2. FEC IDENTIFICATION NUMBER**

C

C00765909

**3. TYPE OF REPORT** (Choose One)Check here if this is a Termination Report (TER) ☐Quarterly Reports:☒ April 15 (Q1) ☐ October 15 (Q3)  
☐ July 15 (Q2) ☐ January 31 Year-End Report (YE)Monthly Reports:☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11)  
☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12)  
☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)☐ 12-Day Pre-Election Report for the Election on

M M / D D / Y Y Y Y Y Y

in the State of

☐ 30-Day Post-Election Report for the General Election on

M M / D D / Y Y Y Y Y Y

**4. IS THIS REPORT AN AMENDMENT?**☐ yes☒ no**5. COVERING PERIOD**M M / D D / Y Y Y Y Y Y  
01 / 01 / 2024

THROUGH

M M / D D / Y Y Y Y Y Y  
03 / 31 / 2024

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

Type or Print Name of Treasurer Tevin, Rivers, , ,

Signature of Treasurer Tevin, Rivers, , ,

Date

M M / D D / Y Y Y Y Y Y  
05 / 05 / 2024NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.  
All previous versions of this form are obsolete and should no longer be used.Office  
Use  
Only

FEC Form 3P (Rev. 05/2016)

Write or Type Committee Name

**PULLIAM'S COMMITTEE**

Report Covering the Period:

From:

M M / D D / Y Y Y Y  
01 / 01 / 2024

To:

M M / D D / Y Y Y Y  
03 / 31 / 2024**SUMMARY**

6. CASH ON HAND AT BEGINNING OF REPORTING PERIOD .....	1986464.00
7. TOTAL RECEIPTS THIS PERIOD (From Line 22, Column A, Page 3) .....	2300.00
8. SUBTOTAL (Lines 6 and 7) .....	1988764.00
9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30, Column A, Page 4) .....	0.00
10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8).....	1988764.00
11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C-P or Schedule D-P).....	0.00
12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C-P or Schedule D-P).....	1350000.00
13. EXPENDITURES SUBJECT TO LIMITATION (Use the worksheet on Page 8 to calculate this amount.).....	54616.00

**NET ELECTION CYCLE-TO-DATE CONTRIBUTIONS AND EXPENDITURES**

14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d, Column B on Page 4 from 17e, Column B on Page 3).....	692300.00
15. NET OPERATING EXPENDITURES (Subtract Line 20a, Column B on Page 3 from 23, Column B on Page 4) .....	47636.00

**DETAILED SUMMARY PAGE**  
of Receipts

FEC Form 3P (Rev. 05/2016)

NAME OF COMMITTEE (in Full)

PULLIAM'S COMMITTEE

Report Covering the Period:

From:

M M / D D / Y Y Y Y  
01 / 01 / 2024

To:

M M / D D / Y Y Y Y  
03 / 31 / 2024**I. RECEIPTS****COLUMN A**  
Total This Period**COLUMN B**  
Election Cycle-to-Date

16. FEDERAL FUNDS (Itemize on Schedule A-P) .....	0.00	0.00
17. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) itemized .....	0.00	0.00
(ii) unitemized .....	0.00	0.00
(iii) Total contributions .....	0.00	0.00
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees .....	0.00	0.00
(d) The Candidate .....	2300.00	692300.00
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d)) .....	2300.00	692300.00
18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....	0.00	0.00
19. LOANS RECEIVED:		
(a) Loans Received From or Guaranteed by Candidate .....	0.00	1350000.00
(b) Other Loans .....	0.00	0.00
(c) TOTAL LOANS (Add 19(a) and 19(b)) .....	0.00	1350000.00
20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):		
(a) Operating .....	0.00	24403.00
(b) Fundraising .....	0.00	0.00
(c) Legal and Accounting .....	0.00	0.00
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c)) .....	0.00	24403.00
21. OTHER RECEIPTS (Dividends, Interest, etc.) .....	0.00	0.00
22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21) .....	2300.00	2066703.00

**DETAILED SUMMARY PAGE**  
of Disbursements and Contributed Items

FEC Form 3P (Rev. 05/2016)

NAME OF COMMITTEE (in Full)  
**PULLIAM'S COMMITTEE**

Report Covering the Period: From:

M M / D D / Y Y Y Y  
01 / 01 / 2024

To:

M M / D D / Y Y Y Y  
03 / 31 / 2024**II. DISBURSEMENTS****COLUMN A**  
Total This Period**COLUMN B**  
Election Cycle-to-Date

23. OPERATING EXPENDITURES.....	0.00	72039.00
24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....	0.00	0.00
25. FUNDRAISING DISBURSEMENTS .....	0.00	7000.00
26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS.....	0.00	0.00
27. LOAN REPAYMENTS MADE:		
(a) Repayments of Loans made or Guaranteed by Candidate.....	0.00	0.00
(b) Other Repayments .....	0.00	0.00
(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b)) .....	0.00	0.00
28. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees.....	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees .....	0.00	0.00
(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c)) .....	0.00	0.00
29. OTHER DISBURSEMENTS .....	0.00	0.00
30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29) .....	0.00	79039.00

**III. CONTRIBUTED ITEMS**  
(Stock, Art Objects, Etc.)

31. ITEMS ON HAND TO BE LIQUIDATED (Attach List) .....	0.00	
---	------	--



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

August 8, 2024

Peter Kessler, in official capacity as Treasurer  
Pulliam's Committee  
1800 Vine Street  
Los Angeles, CA 90028

C00765909  
AF# 4719

Dear Treasurer:

On June 6, 2024, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Pulliam's Committee and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2024 April Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$202 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 1:11 pm, Mar 06, 2025

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

March 6, 2025

**MEMORANDUM**

To: The Commission

Through: Alec Palmer  
Staff Director *AP*

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

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 4719 – Pulliam’s Committee and DaJohn Garrett<sup>1</sup>, in their official capacity as Treasurer (C00765909)

On June 6, 2024, the Commission found reason to believe (RTB) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2024 April Quarterly Report and made a preliminary determination that the civil money penalty was \$202 based on the schedule of penalties at 11 C.F.R. § 111.43. On June 10, 2024, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (ROR) dated August 6, 2024 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference.

The Reviewing Officer confirmed the level of activity and civil money penalty were correctly calculated at RTB. In addition, while sympathetic to the Candidate’s illness and its potential impact on Committee operations, the Reviewing Officer noted that a committee’s treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d). Moreover, illness and unavailability of a treasurer or committee staff are specifically included at 11 C.F.R. § 111.35(d) as examples of circumstances that will not be considered reasonably unforeseen and beyond the respondents’ control. The challenge failed to adequately 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

<sup>1</sup> On 2/28/25, the Committee filed an Amended Statement of Organization (FEC Form 1) to change the Treasurer to DaJohn Garrett. The respondents in this matter have been updated accordingly. See <https://docquery.fec.gov/pdf/070/202502289753997070/202502289753997070.pdf>.



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). 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 \$202 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). After receiving the ROR, the respondents indicated a change in the Committee's Treasurer. The Reviewing Officer advised the Committee to file an amended Statement of Organization (FEC Form 1) to reflect the change in Treasurer. On February 28, 2025, the Committee filed the Amended FEC Form 1 to disclose DaJohn Garrett as Treasurer. Therefore, the Reviewing Officer recommends that the Commission make a final determination that Pulliam's Committee and DaJohn Garrett, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$202 civil money penalty.

### **OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4719 involving Pulliam's Committee and DaJohn Garrett, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4719 that Pulliam's Committee and DaJohn Garrett, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$202 civil money penalty; and
3. Send the appropriate letter.

### **Attachments**

Attachment 1 – Declaration of OAR



## DECLARATION OF RHIANNON MAGRUDER

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.

Political committees authorized by a candidate for the office of President shall file a quarterly report for the period ending March 31 no later than April 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on April 15, 2024 for the 2024 April Quarterly Report to be timely filed.

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:

Cover Page, Summary Page, and Detailed Summary Pages of the 2024 April Quarterly Report filed by Pulliam's Committee. The report includes the coverage period of January 1, 2024 through March 31, 2024 and was electronically filed on May 5, 2024.

Amended Statement of Organization filed by Pulliam's Committee on February 28, 2025.

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 6th day of        h        .

*Rhiannon Magruder*

Rhiannon Magruder

Reviewing Officer

Office of Administrative Review

Federal Election Commission

**FEC  
FORM 3P****REPORT OF RECEIPTS  
AND DISBURSEMENTS**BY AN AUTHORIZED COMMITTEE OF A CANDIDATE  
FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT

Office Use Only

**1. NAME OF COMMITTEE** (in full, type or print)

Example: If typing, type over the lines.

12FE4M5

PULLIAM'S COMMITEE

ADDRESS (number and street)

1800 VINE ST

Check if different  
than previously  
reported. (ACC)

LOS ANGELES

CITY

CA

STATE

90028

ZIP CODE

**2. FEC IDENTIFICATION NUMBER**

C

C00765909

**3. TYPE OF REPORT** (Choose One)Check here if this is a Termination Report (TER) ☐

Quarterly Reports:



April 15 (Q1)



October 15 (Q3)



July 15 (Q2)



January 31 Year-End Report (YE)



Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)



Nov 20 (M11)



Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)



Dec 20 (M12)



Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)



12-Day Pre-Election Report for the Election on

M M / D D / Y Y Y Y Y Y

in the State of



30-Day Post-Election Report for the General Election on

M M / D D / Y Y Y Y Y Y

**4. IS THIS REPORT AN AMENDMENT?**

yes



no

**5. COVERING PERIOD**M M / D D / Y Y Y Y Y Y  
01 / 01 / 2024

THROUGH

M M / D D / Y Y Y Y Y Y  
03 / 31 / 2024

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

Type or Print Name of Treasurer

Tevin, Rivers, , ,

Signature of Treasurer

Tevin, Rivers, , ,

Date

M M / D D / Y Y Y Y Y Y  
05 / 05 / 2024NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. §30109.  
All previous versions of this form are obsolete and should no longer be used.Office  
Use  
Only

FEC Form 3P (Rev. 05/2016)

Write or Type Committee Name

PULLIAM'S COMMITEE

Report Covering the Period:

From:

MM / DD / YYYY  
01 / 01 / 2024

To:

MM / DD / YYYY  
03 / 31 / 2024

SUMMARY

6. CASH ON HAND AT BEGINNING OF REPORTING PERIOD .....	1986464.00
7. TOTAL RECEIPTS THIS PERIOD (From Line 22, Column A, Page 3) .....	2300.00
8. SUBTOTAL (Lines 6 and 7) .....	1988764.00
9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30, Column A, Page 4) .....	0.00
10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8).....	1988764.00
11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C-P or Schedule D-P).....	0.00
12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C-P or Schedule D-P).....	1350000.00
13. EXPENDITURES SUBJECT TO LIMITATION (Use the worksheet on Page 8 to calculate this amount.) .....	54616.00

NET ELECTION CYCLE-TO-DATE CONTRIBUTIONS AND EXPENDITURES

14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d, Column B on Page 4 from 17e, Column B on Page 3).....	692300.00
15. NET OPERATING EXPENDITURES (Subtract Line 20a, Column B on Page 3 from 23, Column B on Page 4).....	47636.00

**DETAILED SUMMARY PAGE**  
of Receipts

FEC Form 3P (Rev. 05/2016)

NAME OF COMMITTEE (in Full)

PULLIAM'S COMMITTEE

Report Covering the Period:

From:

M M / D D / Y Y Y Y  
01 / 01 / 2024

To:

M M / D D / Y Y Y Y  
03 / 31 / 2024

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
16. FEDERAL FUNDS (Itemize on Schedule A-P) .....	0.00	0.00
17. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) itemized .....	0.00	0.00
(ii) unitemized .....	0.00	0.00
(iii) Total contributions .....	0.00	0.00
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees .....	0.00	0.00
(d) The Candidate .....	2300.00	692300.00
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d)) .....	2300.00	692300.00
18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....	0.00	0.00
19. LOANS RECEIVED:		
(a) Loans Received From or Guaranteed by Candidate .....	0.00	1350000.00
(b) Other Loans .....	0.00	0.00
(c) TOTAL LOANS (Add 19(a) and 19(b)) .....	0.00	1350000.00
20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):		
(a) Operating .....	0.00	24403.00
(b) Fundraising .....	0.00	0.00
(c) Legal and Accounting .....	0.00	0.00
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c)) .....	0.00	24403.00
21. OTHER RECEIPTS (Dividends, Interest, etc.) .....	0.00	0.00
22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21) .....	2300.00	2066703.00

**DETAILED SUMMARY PAGE**

FEC Form 3P (Rev. 05/2016)

of Disbursements and Contributed Items

NAME OF COMMITTEE (in Full)

PULLIAM'S COMMITTEE

Report Covering the Period:

From:

M M / D D / Y Y Y Y  
01 / 01 / 2024

To:

M M / D D / Y Y Y Y  
03 / 31 / 2024**II. DISBURSEMENTS****COLUMN A**  
Total This Period**COLUMN B**  
Election Cycle-to-Date

23. OPERATING EXPENDITURES.....	0.00	72039.00
24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....	0.00	0.00
25. FUNDRAISING DISBURSEMENTS .....	0.00	7000.00
26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS.....	0.00	0.00
27. LOAN REPAYMENTS MADE:		
(a) Repayments of Loans made or Guaranteed by Candidate.....	0.00	0.00
(b) Other Repayments .....	0.00	0.00
(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b)) .....	0.00	0.00
28. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees.....	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees .....	0.00	0.00
(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c)) .....	0.00	0.00
29. OTHER DISBURSEMENTS .....	0.00	0.00
30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29) .....	0.00	79039.00

**III. CONTRIBUTED ITEMS**  
(Stock, Art Objects, Etc.)

31. ITEMS ON HAND TO BE LIQUIDATED (Attach List) .....	0.00	
---	------	--

**FEC  
FORM 1****STATEMENT OF  
ORGANIZATION**

Office Use Only

1. NAME OF COMMITTEE (in full) ☐ (Check if name is changed) Example: If typing, type over the lines.

12FE4M5

Pulliam's Committee

ADDRESS (number and street)

1800 Vine St

☐ (Check if address is changed)

Los Angeles

CITY ▲

CA

STATE ▲

90028

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

☐ (Check if address is changed)

alander@alanderpulliam.com

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐ (Check if address is changed)

https://runforwe.weblium.site/

2. DATE

MM / DD / YYYY  
01 / 08 / 2021

3. FEC IDENTIFICATION NUMBER ►

C C00765909

4. IS THIS STATEMENT ☐ NEW (N) OR ☒ AMENDED (A)

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

Type or Print Name of Treasurer Garrett, DaJohn, , ,

Signature of Treasurer Garrett, DaJohn, , ,

Date

MM / DD / YYYY  
02 / 28 / 2025

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

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office  
Use  
OnlyFor further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-694-1100**FEC FORM 1**  
(Revised 06/2012)

## 5. TYPE OF COMMITTEE:

**Candidate Committee:**

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate Pulliam, Alander, , ,

Candidate Party Affiliation NPA Office Sought: ☐ House ☐ Senate ☒ President State    District   

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate   

**Party Committee:**

- (d) ☐ This committee is a    (National, State or subordinate) committee of the    (Democratic, Republican, etc.) Party

**Political Action Committee (PAC):**

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization  
☐ Membership Organization ☐ Trade Association ☐ Cooperative

☐ In addition, this committee is a Lobbyist/Registrant PAC.

- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐ In addition, this committee is a Lobbyist/Registrant PAC.

☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

- (g) ☐ This committee is an independent expenditure-only political committee (Super PAC).

☐ In addition, this committee is a Lobbyist/Registrant PAC.

- (h) ☐ This committee is a political committee with both contribution and non-contribution accounts (Hybrid PAC).

☐ In addition, this committee is a Lobbyist/Registrant PAC.

**Joint Fundraising Representative:**

- (i) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (j) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

## Committees Participating in Joint Fundraiser

1.   

2.   

C   

C

Write or Type Committee Name

## Pulliam's Commitee

## 6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

NONE

Mailing Address

CITY ▲

STATE ▲

ZIP CODE ▲

Relationship: ☐ Connected Organization ☐ Affiliated Organization ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

## 7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name Garrett, DaJohn, , ,

Mailing Address 1800 Vine St

Los Angeles

CA

90028

CITY ▲

STATE ▲

ZIP CODE ▲

Title or Position ▼

TR

Telephone number

818

475

9721

## 8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer Garrett, DaJohn, , ,

Mailing Address 1800 Vine St

Los Angeles

CA

90028

CITY ▲

STATE ▲

ZIP CODE ▲

Title or Position ▼

Telephone number

818

475

9721



Full Name of  
Designated  
Agent

Garrettss, Dajohn, , ,

Mailing Address

1800 Vine St

Los Angeles

CA

91601

CITY ▲

STATE ▲

ZIP CODE ▲

Title or Position ▼

Telephone number

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Sofi Bank

Mailing Address

331 S Rio Grande St

Ste 370

Salt Lake City

UT

84101

CITY ▲

STATE ▲

ZIP CODE ▲

Name of Bank, Depository, etc.

Sofi Bank

Mailing Address

1800 Vine St

Los Angeles

CA

90028

CITY ▲

STATE ▲

ZIP CODE ▲

: 97 `A-G79 @G B9CI G`H9LH`F9 @5 H98 `HC`5 `F9DCFHŽG7 <98I @`CF`+9A-N5HCB  
.

Form/Schedule: F1A  
Transaction ID :

My committee is acting as a joint Fundraising Representative in addition to being a Principal Campaign Committee

Form/Schedule:  
Transaction ID:

5(g) or (h). **Joint Fundraising Participant:**

1. \_\_\_\_\_  
 2. \_\_\_\_\_  
 3. \_\_\_\_\_  
 4. \_\_\_\_\_

FEC ID number

C \_\_\_\_\_

FEC ID number

C \_\_\_\_\_

FEC ID number

C \_\_\_\_\_

FEC ID number

C \_\_\_\_\_

6. **Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor**

\_\_\_\_\_  
 \_\_\_\_\_

Mailing Address

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Relationship:

CITY ▲

STATE ▲

ZIP CODE ▲

☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

8. **Designated Agent:** Identify by name, address (phone number – optional)

Full Name Pulliam, Justin, , , \_\_\_\_\_

Mailing Address 1322 Hanger St \_\_\_\_\_

\_\_\_\_\_  
 Little Rock AR 72202 \_\_\_\_\_

TITLE OR POSITION ▼

CITY ▲

STATE ▲

ZIP CODE ▲

\_\_\_\_\_  
 Telephone Number \_\_\_\_\_ - \_\_\_\_\_ - \_\_\_\_\_

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc. \_\_\_\_\_

Mailing Address \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

CITY ▲

STATE ▲

ZIP CODE ▲

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) AF 4719  
 Final Determination Recommendation in )  
 AF# 4719 – Pulliam’s Committee and )  
 DaJohn Garrett, in their official capacity )  
 as Treasurer (C00765909) )

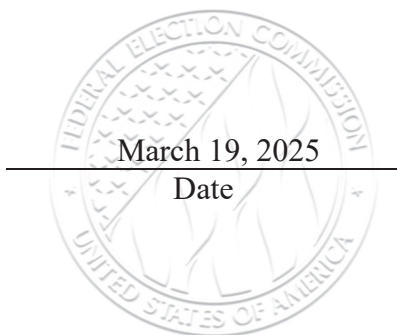
CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on March 19, 2025, the Commission decided by a vote of 4-0 to take the following actions in AF 4719:

1. Adopt the Reviewing Officer recommendation for AF# 4719 involving Pulliam’s Committee and DaJohn Garrett, in their official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 4719 that Pulliam’s Committee and DaJohn Garrett, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$202 civil money penalty.
3. Send the appropriate letter.

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

Attest:



Vicktoria J Allen

Digitally signed by Vicktoria J Allen  
 Date: 2025.03.19 18:50:19 -04'00'

Vicktoria J. Allen  
 Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

March 28, 2025

DaJohn Garrett, in official capacity as Treasurer  
Pulliam's Committee  
1800 Vine Street  
Los Angeles, CA 90028

C00765909  
AF# 4719

Dear Treasurer:

On June 6, 2024, the Federal Election Commission (the "Commission" or "FEC") found reason to believe ("RTB") that Pulliam's Committee and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2024 April Quarterly Report. By letter dated June 10, 2024, the Commission sent notification of the RTB finding that included a civil money penalty calculated at \$202 in accordance with the schedule of penalties at 11 CFR § 111.43. On June 10, 2024, 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 Pulliam's Committee 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 \$202 in accordance with 11 CFR § 111.43. The Reviewing Officer Recommendation was sent to you on August 8, 2024.

On March 19, 2025, the Commission adopted the Reviewing Officer's recommendation and made a final determination that Pulliam's Committee 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 \$202. A copy of the Final Determination Recommendation is attached.

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

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you must submit a written petition 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 CFR § 111.38.

## **2. If You Choose to Not Pay the Civil Money Penalty and to Not 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 by Treasury to enforce recovery of a delinquent debt 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 should decide to pay the civil money penalty, please follow the payment instructions below. You should make payment within thirty (30) days of receipt of this letter.

You may remit payment by Automated Clearinghouse (“ACH”) withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government’s secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](http://www.fec.gov/af/pay.shtml) to be directed to Pay.gov’s Administrative Fine Program Payment form. Please use the details 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 this matter, please contact Rhiannon Magruder on our toll-free number (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,

A handwritten signature in black ink, reading "J.E. Trainor, III". The signature is fluid and cursive, with the letters "J.E." and "Trainor" being more distinct, and "III" written in a smaller, simpler script at the end.

James E. "Trey" Trainor III  
Acting Chairman