



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
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;	)	

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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.

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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.

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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.

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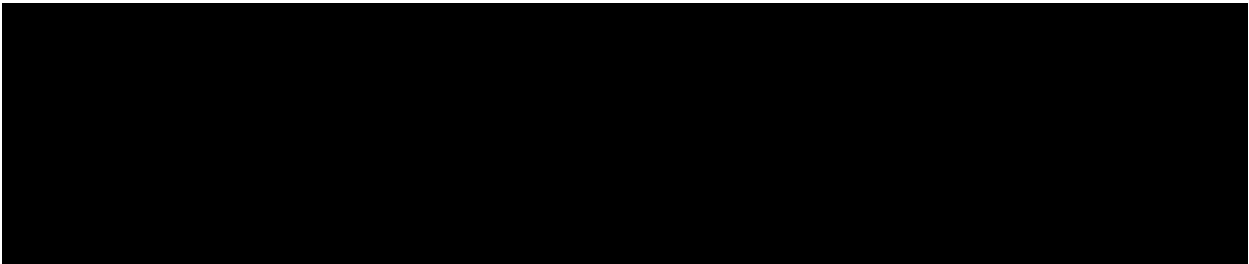
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AF#4715 Decided by a vote of 5-0 to: (1) find reason to believe that LOVE FOR TEXAS, and TENORIO, DAPHNE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would 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#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.

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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.

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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

Leon Zeno, in official capacity as Treasurer
Raja Chaudhry Campaign, Inc.
104430 Lenox Lane
Dallas, TX 75229

C00846840
AF#: 4720
FINE: \$9,725

Dear Leon Zeno,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an April Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period February 15, 2024 through March 31, 2024, shall be filed no later than April 15, 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 June 6, 2024, the Commission found that there is reason to believe ("RTB") that Raja Chaudhry Campaign, Inc. 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 \$9,725. 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 \$9,725 is due within forty (40) days of the finding, or by July 16, 2024, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: \$193,285
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

RAJA CHAUDHRY CAMPAIGN, INC.

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

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

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

RAJA CHAUDHRY CAMPAIGN, INC.

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date they are electronically received by staff.

In addition, if you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address, and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response challenging the RTB finding and/or calculated civil money penalty, the FEC will conclude that the factual allegations are true and make a final determination that Raja Chaudhry Campaign, Inc. 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.

RAJA CHAUDHRY CAMPAIGN, INC.

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Settlement Offers

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

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 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 9:21 am, Oct 29, 2024



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

October 29, 2024

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer ^{AP by DCB}
Staff Director

FROM: Patricia C. Orrock ^{PCO}
Chief Compliance Officer

Debbie Chacona ^{DC}
Assistant Staff Director
Reports Analysis Division

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the
2024 April Quarterly 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 2024 April Quarterly 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, seven (7) 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.

BLAKPAC (AF 4704) filed the 2024 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that

assessed at RTB. The committee disclosed total receipts and disbursements of \$155 (previously estimated to be \$60,029), thus the fine would be lowered from \$4,774 to \$155.

Center Street PAC (AF 4706) filed the 2024 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$0 (previously estimated to be \$72,519), thus the fine would be lowered from \$5,967 to \$0.

For the Many PAC (AF 4710) 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 \$12,156).

Frontiers of Freedom Action, Inc. (AF 4711) filed the 2024 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$107 (previously estimated to be \$138,448), thus the fine would be lowered from \$7,958 to \$107.

Matt Leiv for Illinois (AF 4716) disclosed no activity after the RTB finding (previously estimated to be \$41,881), which would result in no civil money penalty (fine previously assessed to be \$1,497).

Santos Limon for Congress (AF 4721) filed the 2024 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$20,486 (previously estimated to be \$57,939), thus the fine would be lowered from \$4,774 to \$832.

Sharon Savage for Senate (AF 4723) filed the 2024 April Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$2,121 (previously estimated to be \$74,445), thus the fine would be lowered from \$4,774 to \$415.

For your information, four (4) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

Caroline Kane for Congress (AF 4705) filed an Amended Statement of Organization after the RTB finding designating Thomas Datwyler as Treasurer.

Commander Jay Furman for Congress (AF 4707) filed an Amended Statement of Organization after the RTB finding designating David Satterfield as Treasurer.

Tamie Wilson for US (AF 4724) filed an Amended Statement of Organization after the RTB finding designating Kyle Pierce as Treasurer.

Travis County Republican Party Federal Committee (AF 4726) filed an Amended Statement of Organization after the RTB finding designating Leland Bickers 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
2024 APRIL QUARTERLY Not Election Sensitive 04/15/2024 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
4702	AGENDA PAC		C00798355	TARIEM BURROUGHS	05/15/2024	30	\$78,824	0	06/06/2024	\$6,046	\$6,046	07/05/2024	\$6,046
4705	CAROLINE KANE FOR CONGRESS	CAROLINE KANE	C00832873	THOMAS DATWYLER	05/01/2024	16	\$17,645	0	06/06/2024	\$274	\$274	07/03/2024	\$274
4707	COMMANDER JAY FURMAN FOR CONGRESS	JAY FURMAN	C00857433	DAVID SATTERFIELD	05/16/2024	*Not Filed	\$49,955	0	06/06/2024	\$1,497	\$1,497	06/11/2024	\$1,497
4708	DENNIS BAKER FOR CONGRESS	DENNIS BAKER	C00838938	DENNIS BAKER	04/28/2024	13	\$41,611	0	06/06/2024	\$782	\$782	06/21/2024	\$782
4713	JENNIFER ADAMS FOR CONGRESS	JENNIFER ADAMS	C00852152	J. ADAMS	04/24/2024	9	\$75,111	0	06/06/2024	\$1,729	\$1,729	07/16/2024	\$1,729
4724	TAMIE WILSON FOR US	TAMARA WILSON	C00784983	KYLE PIERCE	05/04/2024	19	\$154,266	2	06/06/2024	\$9,649	\$9,649	07/13/2024	\$9,649
4725	TEXAS SPINE AND JOINT LTD PAC		C00437525	ANTHONY WAHL	04/22/2024	7	\$37,756	0	06/06/2024	\$584	\$584	07/16/2024	\$584

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

Federal Election Commission
FD Circulation Report Fine Not Paid
2024 APRIL QUARTERLY Not Election Sensitive 04/15/2024 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
4704	BLAKPAC		C00571398	CARL A. MARBURY	07/15/2024	*Not Filed	\$155	0	06/06/2024	\$4,774	145	\$155
4706	CENTER STREET PAC		C00790659	MATTHEW O'BRIEN	07/16/2024	*Not Filed	\$0	1	06/06/2024	\$5,967	145	NONE
4709	FIGHTING 4 ONE AMERICA PAC		C00858670	DEREK LEWIS		Not Filed	\$148,000 (est)	0	06/06/2024	\$7,958	145	\$7,958
4710	FOR THE MANY PAC		C00781104	KINA COLLINS		**Not Filed	\$0	1	06/06/2024	\$12,156	145	NONE
4711	FRONTIERS OF FREEDOM ACTION, INC.		C00826776	GEORGE LANDRITH	10/10/2024	*Not Filed	\$107	0	06/06/2024	\$7,958	145	\$107
4712	HOLLY MCCORMACK FOR CONGRESS	HOLLY MCCORMACK	C00767798	HOLLY MCCORMACK		Not Filed	\$538,205 (est)	4	06/06/2024	\$33,596	145	\$33,596
4714	JOHN CONYERS FOR CONGRESS	JOHN CONYERS	C00804500	OFFICE OF TREASURER		Not Filed	\$56,243 (est)	3	06/06/2024	\$8,354	145	\$8,354
4715	LOVE FOR TEXAS	JOHN BENARD LOVE III	C00720573	DAPHNE TENORIO	07/15/2024	*Not Filed	\$27,581	0	06/06/2024	\$832	145	\$832
4716	MATT LEIV FOR ILLINOIS	MATTHEW LEIV	C00833830	OFFICE OF TREASURER		**Not Filed	\$0	0	06/06/2024	\$1,497	145	NONE
4717	MERIKA COLEMAN FOR CONGRESS	MERIKA COLEMAN	C00853945	DEANNA REED		Not Filed	\$126,024 (est)	0	06/06/2024	\$7,958	145	\$7,958
4718	PHILLIP DRAKE UNITING AMERICA 2024	PHILLIP JOSEPH DRAKE	C00839845	PHIL DRAKE		Not Filed	\$342,733 (est)	0	06/06/2024	\$14,146	145	\$14,146
4720	RAJA CHAUDHRY CAMPAIGN, INC.	RAJA CHAUDHRY	C00846840	LEON ZENO		Not Filed	\$193,285 (est)	0	06/06/2024	\$9,725	145	\$9,725
4721	SANTOS LIMON FOR CONGRESS	SANTOS M. LIMON	C00846063	SANTOS LIMON	08/23/2024	*Not Filed	\$20,486	0	06/06/2024	\$4,774	145	\$832
4722	SARAH GAD FOR U.S. CONGRESS	SARAH GAD	C00847004	DANTE DESERANNO		Not Filed	\$69,536 (est)	0	06/06/2024	\$4,774	145	\$4,774
4723	SHARON SAVAGE FOR SENATE	SHARON MAUREEN SAVAGE	C00848879	SHARON SAVAGE	07/17/2024	*Not Filed	\$2,121	0	06/06/2024	\$4,774	145	\$415
4726	TRAVIS COUNTY REPUBLICAN PARTY FEDERAL COMMITTEE		C00418889	LELAND BICKERS	04/25/2024	10	\$28,703	0	06/06/2024	\$683	145	\$683

* 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 2024 April Quarterly reporting period.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Administrative Fine Program – Final	)	
Determination Recommendation for the	)	
2024 April Quarterly Report:	)	
AGENDA PAC, and BURROUGHS,	)	AF# 4702
TARIEM as treasurer;	)	
BLAKPAC, and MARBURY, CARL A as	)	AF# 4704
treasurer;	)	
CAROLINE KANE FOR CONGRESS, and	)	AF# 4705
DATWYLER, THOMAS as treasurer;	)	
CENTER STREET PAC, and OBRIEN,	)	AF# 4706
MATTHEW as treasurer;	)	
COMMANDER JAY FURMAN FOR	)	AF# 4707
CONGRESS, and SATTERFIELD, DAVID	)	
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;	)	

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PHILLIP DRAKE UNITING AMERICA	AF# 4718
2024, and DRAKE, PHIL 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 PIERCE,	) AF# 4724
KYLE as treasurer;	)
TEXAS SPINE AND JOINT LTD PAC,	) AF# 4725
and ANTHONY WAHL as treasurer;	)
TRAVIS COUNTY REPUBLICAN	) AF# 4726
PARTY FEDERAL COMMITTEE, and	)
BICKERS, LELAND as treasurer;	)

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission,
 do hereby certify that on October 30, 2024 the Commission took the following
 actions on the Administrative Fine Program – Final Determination Recommendation
 for the 2024 April Quarterly Report, as recommended in the Reports Analysis
 Division's Memorandum dated October 29, 2024, on the following committees:

AF#4702 Decided by a vote of 6-0 to: (1) make a final determination that AGENDA PAC, and BURROUGHS, TARIEM 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#4704 Decided by a vote of 6-0 to: (1) make a final determination that BLAKPAC, and MARBURY, CARL A 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#4705 Decided by a vote of 6-0 to: (1) make a final determination that CAROLINE KANE FOR CONGRESS, and DATWYLER, THOMAS in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4706 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#4707 Decided by a vote of 6-0 to: (1) make a final determination that COMMANDER JAY FURMAN FOR CONGRESS, and SATTERFIELD, DAVID 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#4708 Decided by a vote of 6-0 to: (1) make a final determination that DENNIS BAKER FOR CONGRESS, and BAKER, DENNIS 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#4709 Decided by a vote of 6-0 to: (1) make a final determination that FIGHTING 4 ONE AMERICA PAC, and LEWIS, DEREK 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#4710 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 a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4711 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 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#4712 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#4713 Decided by a vote of 6-0 to: (1) make a final determination that JENNIFER ADAMS FOR CONGRESS, and ADAMS, J 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#4714 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#4715 Decided by a vote of 6-0 to: (1) make a final determination that LOVE FOR TEXAS, and TENORIO, DAPHNE 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#4716 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 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#4717 Decided by a vote of 6-0 to: (1) make a final determination that MERIKA COLEMAN FOR CONGRESS, and REED, DEANNA 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#4718 Decided by a vote of 6-0 to: (1) make a final determination that PHILLIP DRAKE UNITING AMERICA 2024, and DRAKE, PHIL 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#4720 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.

AF#4721 Decided by a vote of 6-0 to: (1) make a final determination that SANTOS LIMON FOR CONGRESS, and LIMON, SANTOS 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#4722 Decided by a vote of 6-0 to: (1) make a final determination that SARAH GAD FOR U.S. CONGRESS, and DESERANNO, DANTE 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#4723 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#4724 Decided by a vote of 6-0 to: (1) make a final determination that TAMIE WILSON FOR US, and PIERCE, KYLE 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#4725 Decided by a vote of 6-0 to: (1) make a final determination that TEXAS SPINE AND JOINT LTD PAC, and ANTHONY WAHL 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#4726 Decided by a vote of 5-0 to: (1) make a final determination that TRAVIS COUNTY REPUBLICAN PARTY FEDERAL COMMITTEE, and BICKERS, LELAND 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, and Weintraub voted affirmatively for the decision. Commission Trainor recused himself with respect to this matter and did not vote.

Federal Election Commission
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Attest:



October 31, 2024

Date

Vicktoria J Allen

Digitally signed by Vicktoria J
Allen
Date: 2024.10.31 13:21:45
-04'00'

Vicktoria J. Allen

Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

October 31, 2024

Leon Zeno, in official capacity as Treasurer
Raja Chaudhry Campaign, Inc.
104430 Lenox Lane
Dallas, TX 75229

C00846840

AF#: 4720
FINE: \$9,725

Dear Leon Zeno,

On June 6, 2024, the Federal Election Commission (the "Commission" or "FEC") found reason to believe ("RTB") that Raja Chaudhry Campaign, Inc. and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2024 April Quarterly Report. By letter dated June 10, 2024, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$9,725, 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 April Quarterly 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 30, 2024 that Raja Chaudhry Campaign, Inc. 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 \$9,725, 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: \$193,285
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

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

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

RAJA CHAUDHRY CAMPAIGN, INC.

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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

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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

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