

RECEIVED

By Office of the Commission Secretary at 11:12 am, Jun 11, 2024

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

June 11, 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: *KDR*
Kristin D. Roser
Compliance Branch

SUBJECT: Reason to Believe Recommendation -
Failure to File 48-Hour Notices under the Administrative Fine Program

Attached is the name of a principal campaign committee that has failed to file 48-hour notices with the Commission for contributions of \$1,000.00 or more received from the close of books for the Illinois 12-Day Pre-Primary Report up to 48 hours before the March 19, 2024 Primary Election in accordance with 52 U.S.C. § 30104(a) and 11 CFR. § 104.5(f). The committee, Crawl for Congress, represents a candidate who lost the Primary Election. The committee is being referred for failing to file 48-hour notices for contributions totaling \$38,054.97.

A 48-hour notice is required to report all contributions of a \$1,000.00 or more, to any authorized committee of a candidate, including contributions from the candidate, loans from the candidate and other non-bank sources and endorsements or guarantees of loans from banks, as per 11 CFR § 104.5(f).

We have attached an information sheet which includes the contributor's name, date of receipt and amount of the contribution for which a 48-hour notice was not filed.

In accordance with the schedule of civil money penalties outlined within 11 CFR § 111.44, this committee should be assessed the civil money penalty so indicated.

Recommendation

1. Find reason to believe that Crowl for Congress and Scott Alan Crowl, in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that a civil money penalty of \$3,983 be assessed.
2. Send the appropriate letter.

Attachment

Contributions for Which a 48-Hour Notice Was Not Received**AF 4728****Committee ID: C00851683****Committee Name: Crawl for Congress****Report Type: 2024 April Quarterly Report (02/29/2024 – 03/31/2024)****48-Hour Reporting Period: 02/29/2024 – 03/16/2024**

CONTRIBUTOR	DATE	AMOUNT
CROWL, SCOTT	3/5/2024	\$38,054.97
	TOTAL	\$38,054.97

Proposed Civil Money Penalty: \$3,983 ((1 Notice Not Filed at \$178 each) + (10% of the Overall Contributions Not Reported))

Federal Election Commission
Reason to Believe Circulation Report
48-Hour Notification Report

6/11/2024 8:03 AM

AF#	Committee ID	Committee Name	State	Election	Candidate Name	Treasurer	Prev Violations	Notices Not Filed	LOA	Penalty
4728	C00851683	CROWL FOR CONGRESS	IL	PRIMARY	MR. SCOT ALAN CROWL	SCOTT ALAN CROWL	0	1	\$38,054	\$3,983

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 4728
 Reason to Believe Recommendation -)
 Failure to File 48-Hour Notices under the)
 Administrative Fine Program: Crawl for)
 Congress and Scott Alan Crawl, in their)
 official capacity as treasurer)

CERTIFICATION

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

Commission, do hereby certify that on June 13, 2024, the Commission decided

by a vote of 4-0 to take the following actions in AF 4728:

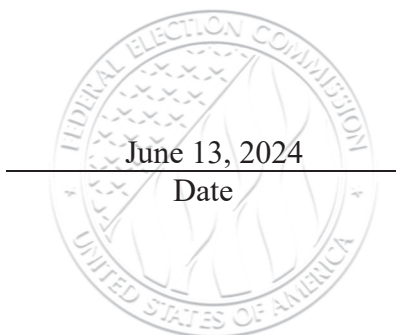
1. Find reason to believe that Crawl for Congress and Scott Alan Crawl, in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that a civil money penalty of \$3,983 be assessed.
2. Send the appropriate letter.

Commissioners Cooksey, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Dickerson did not vote.

Attest:

**Vicktoria J
Allen**

Digitally signed by Vicktoria
J Allen
Date: 2024.06.13 16:09:14
-04'00'



Vicktoria J. Allen
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

June 14, 2024

Scott Alan Crowl, in official capacity as Treasurer
Crowl for Congress
4708 134th Avenue West
Milan, IL 61264

C00851683

AF#: 4728
FINE: \$3,983

Dear Scott Alan Crowl,

The Federal Election Campaign Act of 1971, as amended, 52 U.S.C. § 30101, et seq. ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing the Federal Election Commission (the "Commission" or "FEC") and the Secretary of State, as appropriate, of any contribution of \$1,000 or more, received by any authorized committee of the candidate after the 20th day, but more than 48 hours before, any election. 52 U.S.C. § 30104(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. These notification requirements are in addition to all other reporting requirements. 52 U.S.C. § 30104(a). Our records indicate that Crowl for Congress did not submit 48-Hour Notices for contributions of \$1,000 or more, received between February 29, 2024 and March 16, 2024, totaling \$38,055, as required by 52 U.S.C. § 30104(a)(6)(A). Attachment 1.

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 13, 2024, the Commission found that there is Reason to Believe ("RTB") that Crowl for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file the 48-Hour Notices. Based on the FEC's schedule of civil money penalties at 11 CFR § 111.44, the amount of your civil money penalty calculated at the RTB stage is \$3,983. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 2. The FEC's website contains further information about how the administrative fine program works and how the fines are calculated. <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. The amount of the civil money penalty is \$178 for each non-filed notice plus 10 percent of the dollar amount of the contributions not timely reported. The civil money penalty increases by 25 percent for each prior violation. Send your payment of \$3,983 within forty (40) days of the

CROWL FOR CONGRESS

Page 2 of 4

finding, or by July 23, 2024.

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 23, 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

CROWL FOR CONGRESS

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signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the date they are electronically received by staff.

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

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

If you do not pay the calculated civil money penalty and do not submit a written response challenging the RTB finding and/or calculated civil money penalty, the FEC will conclude that the factual allegations are true and make a final determination that Crowl for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, et seq. The Commission may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you decide to pay the calculated civil money penalty, please follow the payment instructions below. Upon receipt of your payment, the FEC will send you a final determination letter.

You may remit payment by Automated Clearinghouse ("ACH") withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit <http://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

CROWL FOR CONGRESS

Page 4 of 4

the Commission assesses upon making a final determination.

Settlement Offers

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

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 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 <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Jacqueline Gausepohl 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

Contributions for Which a 48-Hour Notice Was Not Received**AF 4728****Committee ID: C00851683****Committee Name: Crawl for Congress****Report Type: 2024 April Quarterly Report (02/29/2024 – 03/31/2024)****48-Hour Reporting Period: 02/29/2024 – 03/16/2024**

CONTRIBUTOR	DATE	AMOUNT
CROWL, SCOTT	3/5/2024	\$38,054.97
	TOTAL	\$38,054.97

Proposed Civil Money Penalty: \$3,983 ((1 Notice Not Filed at \$178 each) + (10% of the Overall Contributions Not Reported))

Cowl for Congress
4708 134 Ave. W
Milan, IL 61264.

Federal Election Commission
Washington DC

To Whom It May Concern,

C00851683
AFE # 4728
Fine - \$3983

I am writing to confirm I am Scott Crowl, former candidate and treasurer for my Congressional Campaign, which ended in my March 17th loss in the Illinois Republican Primary.

I acknowledge that the address you sent your notice to is valid, that I am the correct recipient, and that I unknowingly violated the 48-hour reporting requirement per CFR 104.5(f).

With that, I humbly request the reduction or, ideally, elimination of the fine. Since it was my first campaign and I did not hire a professional treasurer, I was not aware of the rule and am ashamed of my non-compliance.

As of now, I do not intend to run for office again, but if I do, I promise to hire a professional treasurer to ensure compliance with this regulation and the timely submission of my Form 6.

Deepest Apologies,

A handwritten signature in black ink, appearing to read "Scott Crowl", with a stylized flourish at the end.

Scott Crowl



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

September 6, 2024

REVIEWING OFFICER RECOMMENDATION OFFICE OF ADMINISTRATIVE REVIEW ("OAR")

AF# 4728 – Crawl for Congress and Scott Alan Crawl, in their official capacity as Treasurer (C00851683)

Summary of Recommendation

Terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file.

Reason-to-Believe Background

In connection with the 2024 Illinois Primary Election held on March 19, 2024, the respondents were required to file 48-Hour Notices of Contributions/Loans ("48-Hour Notices") for contributions of \$1,000 or more received between February 29, 2024 and March 16, 2024.

On June 13, 2024, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file a 48-Hour Notice for one contribution totaling \$38,054.97 and made a preliminary determination that the civil money penalty was \$3,983 based on the schedule of penalties at 11 C.F.R. § 111.44. A letter was sent to the respondents' email address of record from the Reports Analysis Division ("RAD") on June 14, 2024 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") requires that the principal campaign committee of a candidate must notify the Commission, in writing, of any contribution of \$1,000 or more received after the 20th day but more than 48 hours before an election. The principal campaign committee must notify the Commission within 48 hours of receipt of the contribution. The 48-hour notification shall be in addition to all other reporting requirements under the Act. 52 U.S.C. § 30104(a)(6)(A) and 11 C.F.R. § 104.5(f). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Summary of Respondents' Challenge

On July 9, 2024, the Commission received the written response ("challenge") from the Candidate, who also serves as Treasurer, requesting the fine be reduced or waived. He explains that this was his first campaign, and he did not hire a professional treasurer. Further, he was

unaware of the 48-Hour Notice reporting requirement. The Candidate notes that if he runs for office in the future, he will hire a professional treasurer to ensure future compliance.

Analysis

The Candidate contends he was not aware of the Committee's 48-Hour Notice reporting requirements in connection with the 2024 Illinois Primary Election. *See* 11 C.F.R. § 104.5(f). The Commission's regulations, publications, and website explain 48-Hour Notice reporting requirements. The Commission's website¹ explains:

Additional reporting requirements apply to candidate committees less than 20 days but more than 48 hours before the day of an election in which the candidate is running. For these reporting purposes, election day begins at 12:01 a.m.

During this time period, House, Senate and quarterly-filing presidential committees file a 48-Hour Notice (Form 6) anytime they receive a contribution of \$1,000 or more. This notice is due within 48 hours of receiving each qualifying contribution. Committees will also itemize these last-minute contributions in their next regular report.

However, further analysis of Commission records indicates that the Commission did not treat the respondents in accordance with its normal course of business. According to the Assistant Staff Directors of the Commission's Information Division and Reports Analysis Division, a combination of technical and procedural limitations caused a delay in appropriately linking the Candidate and Committee in the Commission's database.² Therefore, the respondents were not included in the February 16, 2024 email distribution of the 2024 Illinois Pre-Primary Report Prior Notice.³ This notice detailed the reporting requirements in connection with the 2024 Illinois Primary Election, including the 48-Hour Notice requirement for contributions of \$1,000 or more received between February 29, 2024 and March 16, 2024.

¹ See <https://www.fec.gov/help-candidates-and-committees/filing-reports/48-hour-notices/>

² Principal campaign committees must file the Form 1 no later than 10 days after the candidate designates the committee on the Statement of Candidacy (FEC Form 2). 11 CFR § 102.1. On 8/28/23, the Candidate filed a FEC Form 2. On 9/27/23, 30 days later, the Committee filed a Statement of Organization (FEC Form 1) designating it as the principal campaign committee of Scott Alan Crowl. Due to current system limitations, the gap in filings resulted in bypassing RAD's initial candidate/committee linkage process. The program used to identify recipients for the Information Division's pre-election Prior Notices depends on accurate committee and candidate linkages in the database. In instances where a candidate is not linked to a committee, the program is supposed to send the email to the candidate at the email address used to electronically file the FEC Form 2. In this case, the program failed to apply this logic, and the 2024 Illinois Primary Election Prior Notice was not sent. On February 27, 2024, as part of its normal quality control procedures associated with RAD's Filing Notification System, RAD identified and resolved the database error. The Commission appropriately sent all subsequent notifications.

³ See <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2024-reporting-dates/prior-notices-2024/election-report-notice-illinois/>

The Reviewing Officer recognizes the Committee may have known to file the 48-Hour Notice if it was treated according to the Commission's normal course of business. Therefore, the Reviewing Officer recommends that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file.

OAR Recommendations

1. Terminate the proceedings in AF# 4728 that Crawl for Congress and Scott Alan Crawl, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file; and
2. Send the appropriate letter.

Attachments

Attachment 1 –

Attachment 2 –

Attachment 3 –

Attachment 4 – Declaration from RAD

Attachment 5 – Declaration from OAR

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission (“Commission”). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Crawl for Congress’ official email addresses of record:
 - A) Request for Additional Information for the 2024 April Quarterly Report, dated April 28, 2024, referencing the missing 48-Hour Notice (sent via electronic mail to: crawlforcongress@outlook.com and sdca4@aol.com);
 - B) Reason-to-Believe Letter, dated June 14, 2024, referencing the missing 48-Hour Notice (sent via electronic mail to: crawlforcongress@outlook.com and sdca4@aol.com).
4. I hereby certify that I have searched the Commission’s public records and find that Crawl for Congress has not yet filed the missing 48-Hour Notice with the Commission.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed on the 5th day of August, 2024.



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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

April 28, 2024

SCOTT ALAN CROWL, TREASURER
CROWL FOR CONGRESS
4708 134TH AVENUE WEST
MILAN, IL 61264

Response Due Date
06/03/2024

IDENTIFICATION NUMBER: C00851683

REFERENCE: APRIL QUARTERLY REPORT (02/29/2024 - 03/31/2024)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions (to include loans, in-kind contributions, and advances) received by your committee after the close of books for the 12 Day Pre-Primary Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

2. Commission Regulations require the continuous reporting of all outstanding loans. This report omits the loan(s) itemized on your previous report(s). Please amend your report(s) to indicate the current status of the following loans from Scott Alan Crowl: \$24,453.47 on 1/26/24, \$4,459.08 on 1/30/24, \$2,172.60 on 2/2/24, \$300.00 on 2/14/24, \$94.69 on 2/15/24, and \$1,980.00 on 2/16/24. (11 CFR §§ 104.3(d) and 104.11)

CROWL FOR CONGRESS

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Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1161.

Sincerely,



Michael Dobi

Sr. Campaign Finance & Reviewing Analyst

439

Missing 48-Hour Notices
Crowl for Congress (C00851683)

Contributor Name	Date	Amount	Election
Crowl, Scott Alan Mr.	3/5/24	\$38,054.97	P2024

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) The principal campaign committee of a candidate must file notifications disclosing contributions of \$1,000 or more which are received after the 20th day but more than 48 hours before an election. These notifications (also called 48-Hour Notices) must be filed with the Commission within 48 hours of the committee's receipt of the contribution(s).
- 3) I hereby certify that I have searched the Commission's public records and find that the Crawl for Congress did not file the required 48-Hour Notice for the contribution included in the Commission's June 13, 2024 RTB finding.
- 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 September, 2024.



Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

September 6, 2024

Scott Alan Crawl, in official capacity as Treasurer
Crawl for Congress
4708 134th Avenue West
Milan, IL 61264

C00851683
AF# 4728

Dear Treasurer:

On June 13, 2024, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Crawl for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file a 48-Hour Notice in connection with the 2024 Illinois Primary Election. The Commission also made a preliminary determination that the civil money penalty was \$3,983 based on the schedule of penalties at 11 C.F.R. § 111.44.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission terminate the proceedings and close the file. 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. 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 9:06 am, Oct 23, 2024

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

October 23, 2024

MEMORANDUM

To: The Commission

Through: Alec Palmer *AP by DCB*
Staff Director

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

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 4728 – Crawl for Congress and Scott Alan Crawl, in their official capacity as Treasurer (C00851683)

On June 13, 2024, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file a 48-Hour Notice for one contribution, totaling \$38,054.97, and made a preliminary determination that the civil money penalty was \$3,983 based on the schedule of penalties at 11 C.F.R. § 111.44. On July 9, 2024, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated September 6, 2024 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference.

The Candidate contended he was not aware of the Committee’s 48-Hour Notice reporting requirements in connection with the 2024 Illinois Primary Election. The Reviewing Officer noted that the Commission’s regulations, publications, and website explain 48-Hour Notice reporting requirements. However, further analysis of Commission records indicated that the Commission did not treat the respondents in accordance with its normal course of business. The Reviewing Officer recognized the Committee may have known to file the 48-Hour Notice if it was treated according to the Commission’s normal course of business. Therefore, the Reviewing Officer recommended that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file. *See ROR.*¹

¹ The Office of the Chief Information Officer has identified the cause of the Prior Notice program logic error noted in the ROR and is working to implement the necessary logic corrections and program enhancements.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). To date, a response has not been received.

The Reviewing Officer recommends that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file.

OAR Recommendations

1. Terminate the proceedings in AF# 4728 that Cowl for Congress and Scott Alan Cowl, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file; and
2. Send the appropriate letter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 4728
 Final Determination Recommendation:)
 Crawl for Congress and Scott Alan)
 Crawl, in their official capacity as)
 Treasurer (C00851683))

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election
 Commission, do hereby certify that on October 30, 2024, the Commission
 decided by a vote of 6-0 to take the following actions in AF 4728:

1. Terminate the proceedings in AF# 4728 that Crawl for Congress
 and Scott Alan Crawl, in their official capacity as Treasurer, violated
 52 U.S.C. § 30104(a) and close the file.
2. Send the appropriate letter.

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

Attest:



October 30, 2024

Date

Vicktoria J Allen

Digitally signed by Vicktoria J
 Allen
 Date: 2024.10.30 16:07:16
 -04'00'

Vicktoria J. Allen
 Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

November 1, 2024

Scott Alan Crawl, in official capacity as Treasurer
Crawl for Congress
4708 134th Avenue West
Milan, IL 61264

C00851683
AF# 4728

Dear Treasurer:

On June 13, 2024, the Federal Election Commission (the "Commission") found reason to believe ("RTB") that Crawl for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file a 48-Hour Notice in connection with the 2024 Illinois Primary Election. By letter dated June 14, 2024, the Commission sent notification of the RTB finding that included a civil money penalty calculated at \$3,983 in accordance with the schedule of penalties at 11 CFR § 111.44. On July 9, 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 terminate the proceedings and close the file. The Reviewing Officer Recommendation was sent to you on September 6, 2024.

On October 30, 2024, the Commission adopted the Reviewing Officer's recommendation to terminate the proceedings with respect to 52 U.S.C. § 30104(a) and close the file. A copy of the Final Determination Recommendation is attached.

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 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 that reads "Sean J. Cooksey".

Sean J. Cooksey
Chairman