



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

September 9, 2024

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division
KDR *BH*

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

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

Attached is a list of political committees and their treasurers who failed to file the 2024 July Quarterly Report in accordance with 52 U.S.C. § 30104(a). The July Quarterly Report was due on July 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 JULY QUARTERLY Not Election Sensitive 07/15/2024 H_S_P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4737	C00863530	ADRIAN POKHAREL FOR U.S. CONGRESS	ADRIAN POKHAREL	KESAB BARAL	\$376,635	0	7/29/2024	14	\$67,542	\$2,394
4738	C00859710	AHMED FOR CONGRESS	AHMED MOSTAFA	AHMED MOSTAFA	\$690,737	0		Not Filed	\$230,246 (est)	\$11,493
4739	C00516864	AUSTAL USA LLC FEDERAL POLITICAL ACTION COMMITTEE		LAURA WATERS	\$108,356	0	8/9/2024	25	\$13,530	\$328
4740	C00797340	BLUE CD2 NEW MEXICO USA		MARTHA R. BURT	\$297,925	0		Not Filed	\$99,308 (est)	\$6,188
4741	C00791236	COMMITTEE TO ELECT ANN MARIE DANIMUS	ANN MARIE DANIMUS	ANN MARIE DANIMUS	\$343,793	1	7/25/2024	10	\$75,646	\$3,107
4742	C00869685	COMMITTEE TO ELECT KAREN RENE FOR CONGRESS	KAREN RENE	KARL FORD	\$117,675	0		Not Filed	\$117,675 (est)	\$7,958
4743	C00858928	DIEHL FOR CONGRESS	ABIGAIL DIEHL	KURTIS MICHAUD	\$130,883	0		Not Filed	\$65,442 (est)	\$4,774
4744	C00852483	EISEN FOR NY	JOSHUA EISEN	JOSHUA EISEN	\$555,117	0		Not Filed	\$277,559 (est)	\$14,146
4745	C00851550	ELIAS BASSILE ELECTION COMMITTEE	ELIAS BASSILE	ELIAS BASSILE	\$1,005,337	0		Not Filed	\$335,112 (est)	\$14,146
4746	C00858670	FIGHTING 4 ONE AMERICA PAC		DEREK LEWIS	\$148,000	0		Not Filed	\$148,000 (est)	\$7,958
4747	C00854364	FRIENDS OF BLAKE LYNCH	BLAKE LYNCH	BLAKE LYNCH	\$169,359	0		Not Filed	\$84,680 (est)	\$6,188
4748	C00832477	FRIENDS OF GABRIEL FOR CONGRESS	GABRIEL NJINIMBOT	YVONNE LUMA GWANFOGBE	\$131,710	0	8/14/2024	30	\$18,573	\$358
4749	C00844191	FRIENDS OF KOURI MARSHALL	KOURI MARSHALL	JAMES BRERETON	\$255,604	0		Not Filed	\$63,901 (est)	\$4,774
4750	C00839852	FRIENDS OF NIKHIL BHATIA	NIKHIL BHATIA	TIM HERBERT	\$321,737	0		Not Filed	\$64,347 (est)	\$4,774
4751	C00815787	GEORGIANS PAC		KEITH ROBERT HEFFRON	\$247,590	0		Not Filed	\$247,590 (est)	\$11,493
4752	C00767798	HOLLY MCCORMACK FOR CONGRESS	HOLLY MCCORMACK	HOLLY MCCORMACK	\$538,205	5		Not Filed	\$538,205 (est)	\$37,795
4753	C00804500	JOHN CONYERS FOR CONGRESS	JOHN CONYERS	OFFICE OF TREASURER	\$168,729	3		Not Filed	\$56,243 (est)	\$8,354

4755	C00809145	JONES, HERB (US HOUSE)	HERBERT CARROLL JONES, JR.	OFFICE OF TREASURER	\$296,139	4		Not Filed	\$49,357 (est)	\$2,994
4756	C00711358	JOSE CASTILLO FOR CONGRESS	JOSE CASTILLO	JOSE CASTILLO	\$151,366	0	7/29/2024	14	\$42,984	\$815
4757	C00841551	JUSTIN MOORE FOR TEXAS	JUSTIN MOORE	FREDERICK HAYNES III	\$388,384	0		Not Filed	\$77,677 (est)	\$6,188

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4758	C00853945	MERIKA COLEMAN FOR CONGRESS	MERIKA COLEMAN	DEANNA REED	\$252,048	0		Not Filed	\$126,024 (est)	\$7,958
4759	C00860155	MONTANA OUTDOOR VALUES PAC (MOVPAC)		JILL LOMBARDI	\$6,129,172	0	7/25/2024	10	\$6,129,171	\$12,372
4760	C00383950	NATIONAL ELEVATOR CONSTRUCTORS PAC/ INTN'L UNION OF ELEVATOR CONSTRUCTORS (NEC PAC)		LARRY MCGANN	\$1,223,427	0	7/22/2024	7	\$272,508	\$5,124
4761	C00045781	OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE		MICHAEL S. HERSHY	\$117,752	1	7/25/2024	10	\$40,017	\$853
4762	C00836791	PATH TO FREEDOM PAC		MARK MILTON	\$920,611	0		Not Filed	\$230,153 (est)	\$11,493
4763	C00830505	PHIL ARBALLO FOR CONGRESS	PHIL ARBALLO	PAUL FAUSONE	\$216,753	0		Not Filed	\$36,126 (est)	\$1,497
4764	C00839845	PHILLIP DRAKE UNITING AMERICA 2024	PHILLIP JOSEPH DRAKE	PHIL DRAKE	\$1,028,200	0		Not Filed	\$342,733 (est)	\$14,146
4765	C00192849	PLUMBERS & PIPEFITTERS LOCAL UNION 74 POLITICAL ACTION COMMITTEE		MICHAEL HACKENDORN	\$234,474	1	8/16/2024	*Not Filed	\$38,705	\$1,871
4766	C00846840	RAJA CHAUDHRY CAMPAIGN, INC.	RAJA CHAUDHRY	LEON ZENO	\$386,570	0		Not Filed	\$193,285 (est)	\$9,725
4767	C00846063	SANTOS LIMON FOR CONGRESS	SANTOS M. LIMON	SANTOS LIMON	\$194,303	0		Not Filed	\$48,575 (est)	\$1,497
4768	C00853242	SHREWSBURY FOR SENATE	ZACHARY C. SHREWSBURY	JODI SINE	\$534,575	0		Not Filed	\$178,192 (est)	\$9,725
4769	C00626564	THE SEASONAL EMPLOYER PAC		PETER DELANY, JR.	\$172,407	2	7/24/2024	9	\$97,572	\$3,462
4770	C00839704	VOGEL FOR CONGRESS	JOSEPH VOGEL	KELSEY GARNATZ	\$1,536,820	0	7/29/2024	14	\$280,662	\$7,595
4771	C00663898	WEST VIRGINIA FREEDOM BUILDERS INC		MATTHEW COX	\$375,806	0	9/4/2024	*Not Filed	\$98,371	\$6,188
4772	C00846410	YR VICTORY FUND		BRANDON PRICHARD	\$251,953	0		Not Filed	\$83,984 (est)	\$6,188

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

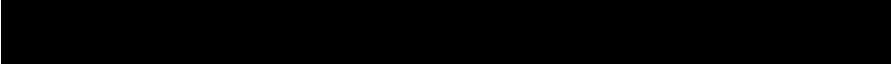
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation –)
2024 July Quarterly Report for the)
Administrative Fine Program:)
ADRIAN POKHAREL FOR U.S.) AF# 4737
CONGRESS, and BARAL, KESAB as)
treasurer;)
AHMED FOR CONGRESS, and) AF# 4738
MOSTAFA, AHMED as treasurer;)
AUSTAL USA LLC FEDERAL) AF# 4739
POLITICAL ACTION COMMITTEE, and)
WATERS, LAURA as treasurer;)
BLUE CD2 NEW MEXICO USA, and) AF# 4740
BURT, MARTHA R as treasurer;)
COMMITTEE TO ELECT ANN MARIE) AF# 4741
DANIMUS, and DANIMUS, ANN MARIE)
as treasurer;)
COMMITTEE TO ELECT KAREN RENE) AF# 4742
FOR CONGRESS, and FORD, KARL as)
treasurer;)
DIEHL FOR CONGRESS, and) AF# 4743
MICHAUD, KURTIS as treasurer;)
EISEN FOR NY, and EISEN, JOSHUA as) AF# 4744
treasurer;)
ELIAS BASSILE ELECTION) AF# 4745
COMMITTEE, and BASSILE, ELIAS as)
treasurer;)
FIGHTING 4 ONE AMERICA PAC, and) AF# 4746
LEWIS, DEREK as treasurer;)
FRIENDS OF BLAKE LYNCH, and) AF# 4747
LYNCH, BLAKE as treasurer;)
FRIENDS OF GABRIEL FOR) AF# 4748
CONGRESS, and GWANFOGBE,)
YVONNE LUMA as treasurer;)
FRIENDS OF KOURI MARSHALL, and) AF# 4749
BRERETON, JAMES MR. as treasurer;)

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FRIENDS OF NIKHIL BHATIA, and	AF# 4750
HERBERT, TIM as treasurer;	
GEORGIANS PAC, and HEFFRON,) AF# 4751
KEITH ROBERT as treasurer;)
HOLLY MCCORMACK FOR) AF# 4752
CONGRESS, and MCCORMACK,)
HOLLY as treasurer;)
JOHN CONYERS FOR CONGRESS, and) AF# 4753
OFFICE OF TREASURER as treasurer;)



JONES, HERB (US HOUSE), and OFFICE) AF# 4755
OF TREASURER as treasurer;)
JOSE CASTILLO FOR CONGRESS, and) AF# 4756
CASTILLO, JOSE as treasurer;)
JUSTIN MOORE FOR TEXAS, and) AF# 4757
HAYNES, FREDERICK III as treasurer;)
MERIKA COLEMAN FOR CONGRESS,) AF# 4758
and REED, DEANNA as treasurer;)
MONTANA OUTDOOR VALUES PAC) AF# 4759
(MOVPAC), and LOMBARDI, JILL as)
treasurer;)
NATIONAL ELEVATOR) AF# 4760
CONSTRUCTORS PAC/ INTN'L UNION)
OF ELEVATOR CONSTRUCTORS (NEC)
PAC), and MCGANN, LARRY as)
treasurer;)
OUTDOOR ADVERTISING) AF# 4761
ASSOCIATION OF AMERICA)
POLITICAL ACTION COMMITTEE, and)
HERSHEY, MICHAEL S as treasurer;)
PATH TO FREEDOM PAC, and MILTON,) AF# 4762
MARK as treasurer;)
PHIL ARBALLO FOR CONGRESS, and) AF# 4763
FAUSONE, PAUL as treasurer;)
PHILLIP DRAKE UNITING AMERICA) AF# 4764
2024, and DRAKE, PHIL as treasurer;)
PLUMBERS & PIPEFITTERS LOCAL) AF# 4765
UNION 74 POLITICAL ACTION)
COMMITTEE, and HACKENDORN,)
MICHAEL as treasurer;)
RAJA CHAUDHRY CAMPAIGN, INC.,) AF# 4766
and ZENO, LEON as treasurer;)
SANTOS LIMON FOR CONGRESS, and) AF# 4767
LIMON, SANTOS as treasurer;)

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SHREWSBURY FOR SENATE, and SINE,)	AF# 4768
JODI as treasurer;)	
THE SEASONAL EMPLOYER PAC, and)	AF# 4769
DELANY, PETER JR. as treasurer;)	
VOGEL FOR CONGRESS, and)	AF# 4770
GARNATZ, KELSEY as treasurer;)	
WEST VIRGINIA FREEDOM BUILDERS)	AF# 4771
INC, and COX, MATTHEW as treasurer;)	
YR VICTORY FUND, and PRICHARD,)	AF# 4772
BRANDON as treasurer;)	

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on September 10, 2024 the Commission took the following actions on the Reason To Believe Recommendation – 2024 July Quarterly Report for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated September 09, 2024, on the following committees:

AF#4737 Decided by a vote of 6-0 to: (1) find reason to believe that ADRIAN POKHAREL FOR U.S. CONGRESS, and BARAL, KESAB in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4738 Decided by a vote of 6-0 to: (1) find reason to believe that AHMED FOR CONGRESS, and MOSTAFA, AHMED in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4739 Decided by a vote of 6-0 to: (1) find reason to believe that AUSTAL USA LLC FEDERAL POLITICAL ACTION COMMITTEE, and WATERS, LAURA 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;

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(2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4740 Decided by a vote of 6-0 to: (1) find reason to believe that BLUE CD2 NEW MEXICO USA, and BURT, MARTHA R in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4741 Decided by a vote of 6-0 to: (1) find reason to believe that COMMITTEE TO ELECT ANN MARIE DANIMUS, and DANIMUS, ANN MARIE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4742 Decided by a vote of 6-0 to: (1) find reason to believe that COMMITTEE TO ELECT KAREN RENE FOR CONGRESS, and FORD, KARL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4743 Decided by a vote of 6-0 to: (1) find reason to believe that DIEHL FOR CONGRESS, and MICHAUD, KURTIS in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4744 Decided by a vote of 6-0 to: (1) find reason to believe that EISEN FOR NY, and EISEN, JOSHUA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4745 Decided by a vote of 6-0 to: (1) find reason to believe that ELIAS BASSILE ELECTION COMMITTE, and BASSILE, ELIAS in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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AF#4746 Decided by a vote of 6-0 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, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4747 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF BLAKE LYNCH, and LYNCH, BLAKE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4748 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF GABRIEL FOR CONGRESS, and GWANFOGBE, YVONNE LUMA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4749 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF KOURI MARSHALL, and BRERETON, JAMES MR. in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4750 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF NIKHIL BHATIA, and HERBERT, TIM in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4751 Decided by a vote of 6-0 to: (1) find reason to believe that GEORGIANS PAC, and HEFFRON, KEITH ROBERT in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

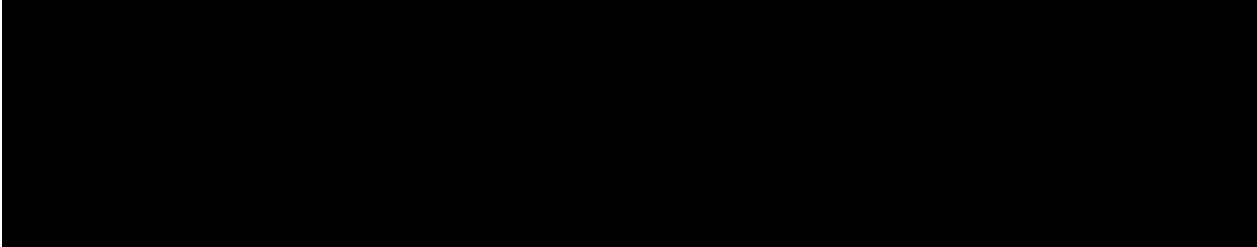
AF#4752 Decided by a vote of 6-0 to: (1) find reason to believe that HOLLY MCCORMACK FOR CONGRESS, and MCCORMACK, HOLLY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary

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determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4753 Decided by a vote of 6-0 to: (1) find reason to believe that JOHN CONYERS FOR CONGRESS, and OFFICE OF TREASURER, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.



AF#4755 Decided by a vote of 6-0 to: (1) find reason to believe that JONES, HERB (US HOUSE), and OFFICE OF TREASURER, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4756 Decided by a vote of 6-0 to: (1) find reason to believe that JOSE CASTILLO FOR CONGRESS, and CASTILLO, JOSE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4757 Decided by a vote of 6-0 to: (1) find reason to believe that JUSTIN MOORE FOR TEXAS, and HAYNES, FREDERICK III in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4758 Decided by a vote of 6-0 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, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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AF#4759 Decided by a vote of 6-0 to: (1) find reason to believe that MONTANA OUTDOOR VALUES PAC (MOVPAC), and LOMBARDI, JILL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4760 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL ELEVATOR CONSTRUCTORS PAC/ INT'L UNION OF ELEVATOR CONSTRUCTORS (NEC PAC), and MCGANN, LARRY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4761 Decided by a vote of 6-0 to: (1) find reason to believe that OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE, and HERSEY, MICHAEL S in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4762 Decided by a vote of 6-0 to: (1) find reason to believe that PATH TO FREEDOM PAC, and MILTON, MARK in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4763 Decided by a vote of 6-0 to: (1) find reason to believe that PHIL ARBALLO FOR CONGRESS, and FAUSONE, PAUL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4764 Decided by a vote of 6-0 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, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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AF#4765 Decided by a vote of 6-0 to: (1) find reason to believe that PLUMBERS & PIPEFITTERS LOCAL UNION 74 POLITICAL ACTION COMMITTEE, and HACKENDORN, MICHAEL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4766 Decided by a vote of 6-0 to: (1) find reason to believe that RAJA CHAUDHRY CAMPAIGN, INC., and ZENO, LEON in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4767 Decided by a vote of 6-0 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, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4768 Decided by a vote of 6-0 to: (1) find reason to believe that SHREWSBURY FOR SENATE, and SINE, JODI in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4769 Decided by a vote of 6-0 to: (1) find reason to believe that THE SEASONAL EMPLOYER PAC, and DELANY, PETER JR. in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4770 Decided by a vote of 6-0 to: (1) find reason to believe that VOGEL FOR CONGRESS, and GARNATZ, KELSEY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4771 Decided by a vote of 6-0 to: (1) find reason to believe that WEST VIRGINIA FREEDOM BUILDERS INC, and COX, MATTHEW in their official

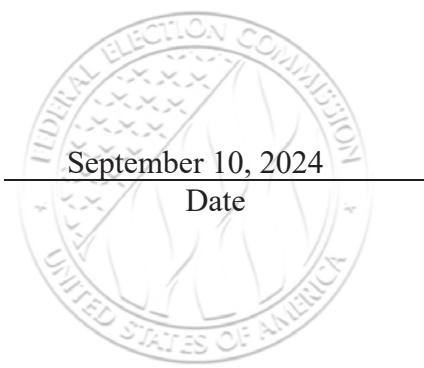
Federal Election Commission
Certification for Administrative Fines
September 10, 2024

Page 9

capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4772 Decided by a vote of 6-0 to: (1) find reason to believe that YR VICTORY FUND, and PRICHARD, BRANDON in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

Attest:



September 10, 2024

Date

Vicktoria J Allen

Digitally signed by Vicktoria J

Allen

Date: 2024.09.10 17:29:56 -04'00'

Vicktoria J. Allen

Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

September 12, 2024

Tim Herbert, in official capacity as Treasurer
 Friends of Nikhil Bhatia
 931 West 18th Place
 1E
 Chicago, IL 60608

C00839852

AF#: 4750
 FINE: \$4,774

Dear Tim Herbert,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a July Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period April 1, 2024 through June 30, 2024, shall be filed no later than July 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 Commission to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On September 10, 2024, the FEC found that there is reason to believe ("RTB") that Friends of Nikhil Bhatia 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 July 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 \$4,774. 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 \$4,774 is due within forty (40) days of the finding, or by October 20, 2024, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
 Level of Activity: \$64,347
 Number of Days Late: Not Filed
 Number of Previous Civil Money Penalties Assessed: 0

FRIENDS OF NIKHIL BHATIA

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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 October 20, 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

FRIENDS OF NIKHIL BHATIA

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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 Friends of Nikhil Bhatia 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.

FRIENDS OF NIKHIL BHATIA

Page 4 of 4

Settlement Offers

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

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. §§ 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <https://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly on the toll-free number, (800) 424-9530 (at the prompt, press 5 to reach the Reports Analysis Division) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll-free number, (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,



Sean J. Cooksey
Chairman

From: [Nikhil Bhatia](#)
To: [FEC Administrative Fines](#)
Subject: Response to Fine
Date: Sunday, October 20, 2024 12:36:54 PM

To whom it may concern:

I am writing in response to a fine for AF # 4750, C00839852 for not filing a Q2 quarterly report. Our committee has had no activity since Election Day, March 19th 2024. We were unaware that we had to file a blank report with no activity after the election. We are currently trying to terminate the committee on FEC file in order not to accrue future penalties. In Quarter 2, the Level of Activity was \$0 because the committee has not raised or spent any money since the election. The committee seeks to close out operations because it's purpose has concluded. We ask that you please rescind the fine for AF #4750, as there was no Level of Activity to support. Thank you,

Nikhil Bhatia



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

December 11, 2024

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

AF# 4750 – Friends of Nikhil Bhatia and Tim Herbert, in their official capacity as Treasurer (C00839852)

Summary of Recommendation

Make a final determination in AF# 4750 that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalty.

Reason-to-Believe Background

The 2024 July Quarterly Report was due on July 15, 2024. The respondents filed the report on December 6, 2024, 144 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On September 10, 2024, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2024 July Quarterly Report and made a preliminary determination that the civil money penalty was \$4,774 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was sent to the respondents’ email address of record from RAD on September 12, 2024 to notify them of the Commission’s RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act (“Act”) states that the treasurer of a principal campaign committee of a candidate shall file a report for the period ending June 30 no later than July 15. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(a)(1)(i). Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on July 15 for the July Quarterly Report to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Summary of Respondents’ Challenge

On October 21, 2024, the Commission received the written response (“challenge”) from the Candidate stating that the Committee did not have any financial activity after participating in

the Illinois Primary Election held on March 19, 2024. The Committee was not aware that it was required to file reports to disclose no activity. The Committee now intends to terminate.

Analysis

A committee's filing obligation ends only when a committee files a termination report, and the Commission notifies them in writing that their termination report has been accepted. 11 C.F.R. § 102.3.¹ To date, the Committee has not filed a termination report. Therefore, the Reviewing Officer confirms the respondents were required to file the 2024 July Quarterly Report by July 15, 2024.²

At the time of the RTB finding, the Commission used an estimated level of activity (\$64,347) to calculate the penalty because the 2024 July Quarterly Report had not yet been filed. 11 C.F.R. § 111.43(d)(2)(i). On December 6, 2024, the Committee filed a report disclosing \$0 in total receipts and \$0 in total disbursements for the reporting period.³ Therefore, the actual level of activity for the 2024 July Quarterly reporting period is \$0. 11 C.F.R. § 111.43(d)(3)(i). Using the schedule of penalties at 11 C.F.R. § 111.43(a) for not election sensitive reports, no penalty should be assessed.

The Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$4,774).

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 4750 involving Friends of Nikhil Bhatia and Tim Herbert, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4750 that Friends of Nikhil Bhatia and Tim Herbert, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$4,774); and
3. Send the appropriate letter.

Attachments

Attachment 1 – [REDACTED]

Attachment 2 – [REDACTED]

Attachment 3 – Declaration from RAD

Attachment 4 – Declaration from OAR

¹ See <https://www.fec.gov/help-candidates-and-committees/terminating-a-committee/>

² The Reviewing Officer confirms the Committee was appropriately notified and reminded of its requirement to file the 2024 July Quarterly Report. See Attachments 2 and 3.

³ <https://docquery.fec.gov/pdf/667/202412069739737667/202412069739737667.pdf>

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission (“Commission”). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by RAD’s Filing Notification System to Friends of Nikhil Bhatia’s official email address of record and any email address(es) entered by the Committee when uploading electronic reports in the last year:
 - A) Filing Reminder email, dated July 10, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: bhatiaforcongress@gmail.com, info@bhatiaforcongress.com, jeremiah@jwaystrategies.com, nikhil.m.bhatia@gmail.com and nikhilmbhatia@gmail.com);
 - B) Late Notification email, dated July 16, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: bhatiaforcongress@gmail.com, info@bhatiaforcongress.com, jeremiah@jwaystrategies.com, nikhil.m.bhatia@gmail.com and nikhilmbhatia@gmail.com).
4. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Friends of Nikhil Bhatia’s official email address of record:
 - A) Non-filer Notice, dated August 2, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: nikhil.m.bhatia@gmail.com);

B) Reason-to-Believe Letter, dated September 12, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: nikhil.m.bhatia@gmail.com).

5. I hereby certify that I have searched the Commission's public records and find that Friends of Nikhil Bhatia has not yet filed the 2024 July Quarterly Report with the Commission.

6. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed on the 7th day of November, 2024.

Kristin D. Roser

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

From: [fecmail@fec.gov](#)
 To: [Reports Analyst Division \(RAD\) Staff, Reference, Technicians, And Honors, Hemispheric Operations](#)
 Subject: FEC Report Due 7/15 (July Quarterly - Candidate Committees)
 Date: Wednesday, July 10, 2024 11:29:46 AM

Federal Election Commission Reminder Email

07/10/2024

Dear Filer,

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

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

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

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

Thank You,

Federal Election Commission (FEC)

This email was sent to: @ToAddress

Your Committee ID at FEC: @FECCommitteeID

FEC-@FECEmailNumber

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

Reminder Email Committee List

#	COMMITTEE ID	COMMITTEE NAME	ANALYST NAME	EMAIL ADDRESSES
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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80	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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85	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
86	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
87	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
88	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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90	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
91	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
92	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
93	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
94	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
95	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
96	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
97	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
98	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
99	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
100	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

2087 C00839852 FRIENDS OF NIKHIL BHATIA Michael Dobi BHATIAFORCONGRESS@GMAIL.COM, INFO@BHATIAFORCONGRESS.COM, JEREMIAH@WAYSTRATEGIES.COM, NIKHIL.M.BHATIA@GMAIL.COM, NIKHILMBHATIA@GMAIL.COM

From: [fecmail@fec.gov](#)
 To: [Reports Analysis Division \(RAC\) Staff](#)
 Subject: FEC Late Filer Notification (Daily Quarterly)
 Date: Tuesday, July 16, 2024 4:59:43 PM

Federal Election Commission - Late Filer Notification

07/16/2024	
<p>Dear Filer,</p> <p>Committee ID: @FECComteid Report Type: July Quarterly Due Date: July 15, 2024 Close of Books: June 30, 2024</p> <p>Our records indicate that you may have been required to file the above report. However, it appears that we have not received the report electronically from you. If you believe you have filed this report or have questions about whether you should be filing this report, please call the Federal Election Commission's Reports Analysis Division at (202) 694-1130 or (800) 424-9530, and press 5. You may also look up your committee's assigned campaign finance analyst or submit a question to your assigned analyst online at https://www.fec.gov/help-candidates-and-committees/question-rnd/.</p> <p>If you need assistance in submitting your report electronically, please call (202) 694-1307 or (800) 424-9530, and press 4 for the Electronic Filing Office.</p> <p>Newly registered campaign committees that have not raised or spent more than \$5,000 by the ending coverage date of the July Quarterly do not need to file this report (we encourage these committees to file a statement with the FEC to clarify for the public record that the committee has not met the \$5,000 reporting threshold).</p> <p>Please do not reply to this notice. It is sent from an unattended account that cannot receive email.</p> <p>Thank you,</p> <p>Federal Election Commission</p> <p>This e-mail is intended only for the use of the Committee/Filer designated as recipient.</p>	

Late Notification Email Committee List

#	COMMITTEE ID	COMMITTEE NAME	ANALYST NAME	EMAIL ADDRESSES
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
8	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
9	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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11	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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37	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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40	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
41	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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59	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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64	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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75	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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94	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
95	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
96	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
97	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
98	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
99	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
100	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-7

August 2, 2024

HERBERT, TIM, TREASURER
FRIENDS OF NIKHIL BHATIA
931 WEST 18TH PLACE
1E
CHICAGO, IL 60608

IDENTIFICATION NUMBER: C00839852

REFERENCE: JULY QUARTERLY REPORT (04/01/2024 - 06/30/2024)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately, 1050 First Street, NE, Washington, DC 20463. For reports shipped via delivery services (e.g., FedEx, UPS or DHL), use the ZIP code 20002. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Jamie Sikorsky in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1137.

FRIENDS OF NIKHIL BHATIA

Page 2 of 2

Sincerely,

Debbie Chacona

Deborah Chacona
Assistant Staff Director

250

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission (“Commission”). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A principal campaign committee of a candidate shall file a report for the period ending June 30 no later than July 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on July 15, 2024 for the 2024 July Quarterly Report to be timely filed.
- 3) I hereby certify that I have searched the Commission’s public records and that the documents identified herein are the true and accurate copies of:
 - a) Cover Page, Summary Page, and Detailed Summary Pages of the 2024 July Quarterly Report filed by Friends of Nikhil Bhatia. The report includes the 2024 July Quarterly Report coverage period of April 1, 2024 through June 30, 2024 and was electronically filed on December 6, 2024.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on the 11th day of December, 2024.

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

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS
For An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M5

Friends of Nikhil Bhatia

ADDRESS (number and street)

931 W. 18th Place 1E

Check if different
than previously
reported. (ACC)

Chicago

IL

60608

ZIP CODE ▲

CITY ▲

STATE ▲

2. FEC IDENTIFICATION NUMBER ▼

C C00839852

3. IS THIS
REPORTNEW
(N)

OR

AMENDED
(A)

STATE ▼ DISTRICT

IL

07

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

- Primary (12P)
- Convention (12C)
- General (12G)
- Special (12S)

Election on

M M / D D / Y Y Y Y

in the
State of

(c) 30-Day POST-Election Report for the:

- General (30G)
- Runoff (30R)
- Special (30S)

Election on

M M / D D / Y Y Y Y

in the
State of

5. Covering Period

M M / D D / Y Y

through

M M / D D / Y Y

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

Type or Print Name of Treasurer Bhatia, Nikhil, , ,

Signature of Treasurer

Bhatia, Nikhil, , ,

Date

M M / D D / Y Y

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

Office
Use
OnlyFEC FORM 3
(Revised 05/2016)

SUMMARY PAGE

of Receipts and Disbursements

FEC Form 3 (Revised 03/2016)

Write or Type Committee Name

Friends of Nikhil Bhatia

Report Covering the Period: From:

M M
04D D
01Y Y Y Y
2024

To:

M M
06D D
30Y Y
2024

6. Net Contributions (other than loans)

- (a) Total Contributions (other than loans) (from Line 11(e))
- (b) Total Contribution Refunds (from Line 20(d))
- (c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))

COLUMN A
This PeriodCOLUMN B
Election Cycle-to-Date

0.00

23383.85

0.00

0.00

0.00

23383.85

7. Net Operating Expenditures

- (a) Total Operating Expenditures (from Line 17)
- (b) Total Offsets to Operating Expenditures (from Line 14).....
- (c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))

0.00

29166.12

0.00

0.00

0.00

29166.12

8. Cash on Hand at Close of Reporting Period (from Line 27).....

- 4099.46

9. Debts and Obligations Owed **TO** the Committee (Itemize all on Schedule C and/or Schedule D)

0.00

10. Debts and Obligations Owed **BY** the Committee (Itemize all on Schedule C and/or Schedule D)

0.00

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov.

DETAILED SUMMARY PAGE

of Receipts

FEC Form 3 (Revised 05/2016)

Write or Type Committee Name

Friends of Nikhil Bhatia

Report Covering the Period: From:

M M
04D D
01Y Y Y Y
2024

To:

M M
06D D
30Y Y Y Y
2024

I. RECEIPTS

COLUMN A
Total This PeriodCOLUMN B
Election Cycle-to-Date

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than

Political Committees

(i) Itemized (use Schedule A)

0.00

8925.00

(ii) Unitemized

0.00

1125.00

(iii) TOTAL of contributions
from individuals

0.00

10050.00

(b) Political Party Committees.....

0.00

0.00

(c) Other Political Committees
(such as PACs)

0.00

500.00

(d) The Candidate.....

0.00

12833.85

(e) TOTAL CONTRIBUTIONS
(other than loans)

0.00

23383.85

(add Lines 11(a)(iii), (b), (c), and (d))..

12. TRANSFERS FROM OTHER
AUTHORIZED COMMITTEES

0.00

0.00

13. LOANS:

(a) Made or Guaranteed by the
Candidate.....

0.00

0.00

(b) All Other Loans.....

0.00

0.00

(c) TOTAL LOANS
(add Lines 13(a) and (b)).....

0.00

0.00

14. OFFSETS TO OPERATING
EXPENDITURES
(Refunds, Rebates, etc.)

0.00

0.00

15. OTHER RECEIPTS
(Dividends, Interest, etc.)

0.00

0.00

16. TOTAL RECEIPTS (add Lines
11(e), 12, 13(c), 14, and 15)
(Carry Total to Line 24, page 4).....

0.00

23383.85

DETAILED SUMMARY PAGE

of Disbursements

FEC Form 3 (Revised 05/2016)

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
17. OPERATING EXPENDITURES.....	0.00	29166.12
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0.00	0.00
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate.....	0.00	0.00
(b) Of All Other Loans	0.00	0.00
(c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)).....	0.00	0.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)).....	0.00	0.00
21. OTHER DISBURSEMENTS	0.00	0.00
22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21) ►	0.00	29166.12

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....	- 4099.46
24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....	0.00
25. SUBTOTAL (add Line 23 and Line 24).....	- 4099.46
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....	0.00
27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25).....	- 4099.46



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

December 12, 2024

Tim Herbert, in official capacity as Treasurer
Friends of Nikhil Bhatia
931 West 18th Place 1E
Chicago, IL 60608

C00839852
AF# 4750

Dear Treasurer:

On September 10, 2024, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Friends of Nikhil Bhatia and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2024 July Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$4,774 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess no civil money penalty. A copy of the Reviewing Officer’s recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. All written responses and supporting documentation should be converted to PDF (Portable Document Format) and must be emailed to the Commission Secretary at secretary@fec.gov. 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 11:03 am, Jan 17, 2025



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

January 17, 2025

MEMORANDUM

To: The Commission

Through: Alec Palmer *AP*
Staff DirectorFrom: Patricia C. Orrock *PCO*
Chief Compliance OfficerRhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 4750 – Friends of Nikhil Bhatia and Tim Herbert, in their official capacity as Treasurer (C00839852)

On September 10, 2024, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2024 July Quarterly Report and made a preliminary determination that the civil money penalty was \$4,774 based on the schedule of penalties at 11 C.F.R. § 111.43. On October 21, 2024, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated December 11, 2024 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference.

The Reviewing Officer noted that the Committee had not yet filed a termination report and confirmed the respondents were required to file the 2024 July Quarterly Report. Further, the Reviewing Officer stated that at the time of the RTB finding, the Commission used an estimated level of activity to calculate the penalty because the 2024 July Quarterly Report had not yet been filed. 11 C.F.R. § 111.43(d)(2)(i). On December 6, 2024, the Committee filed a report disclosing \$0 in total receipts and \$0 in total disbursements for the reporting period. Therefore, the Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$4,774). *See ROR.*

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in their

challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). To date, a response has not been received.

The Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$4,774).

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 4750 involving Friends of Nikhil Bhatia and Tim Herbert, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4750 that Friends of Nikhil Bhatia and Tim Herbert, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$4,774); and
3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 4750
Final Determination Recommendation:)
Friends of Nikhil Bhatia and Tim)
Herbert, in their official capacity as)
Treasurer (C00839852))

CERTIFICATION

I, Laura E. Sinram, Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 29, 2025, the Commission decided by a vote of 6-0 to take the following actions in AF 4750:

1. Adopt the Reviewing Officer recommendation for AF# 4750 involving Friends of Nikhil Bhatia and Tim Herbert, in their official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 4750 that Friends of Nikhil Bhatia and Tim Herbert, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$4,774).
3. Send the appropriate letter.

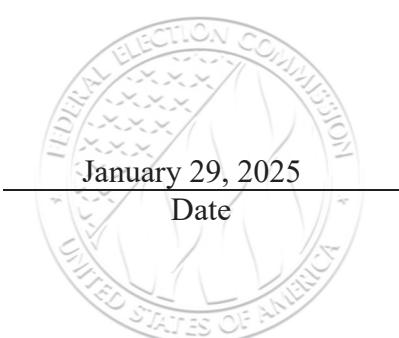
Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

Attest:

Laura E
Sinram

Digitally signed by Laura
E Sinram
Date: 2025.01.29
17:19:38 -05'00'

Laura E. Sinram
Secretary and Clerk of the Commission





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

February 11, 2025

Tim Herbert, in official capacity as Treasurer
Friends of Nikhil Bhatia
931 West 18th Place 1E
Chicago, IL 60608

C00839852
AF# 4750

Dear Tim Herbert:

On September 10, 2024, the Federal Election Commission (the “Commission”) found reason to believe (“RTB”) that Friends of Nikhil Bhatia and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2024 July Quarterly Report. By letter dated September 12, 2024, the Commission sent notification of the RTB finding that included a civil money penalty calculated at \$4,774 in accordance with the schedule of penalties at 11 CFR § 111.43. On October 21, 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 reduce the RTB civil money penalty because it was calculated using an estimated level of activity, make a final determination that Friends of Nikhil Bhatia and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the actual level of activity disclosed on December 6, 2024 (\$0), assess no civil money penalty in accordance with 11 CFR § 111.43. The Reviewing Officer Recommendation was sent to you on December 12, 2024.

On January 29, 2025, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Friends of Nikhil Bhatia and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the level of activity disclosed on December 6, 2024 (\$0), assessed no civil money penalty (reduced from the RTB civil money penalty of \$4,774). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual level of activity, rather than the estimated level of activity, was used. 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, appearing to read "J.E. Trainor, III".

James E. "Trey" Trainor III
Acting Chairman

Attachment