



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

BY: *KDR* *BH*  
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
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 (MOVPA)		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. HERSHEY	\$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
4769	C00626564	THE SEASONAL EMPLOYER PAC		PETER DELANY, JR.	\$172,407	2	7/24/2024	9	\$97,572	\$3,462
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;	)	

Federal Election Commission  
 Certification for Administrative Fines  
 September 10, 2024

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  
 (MOVPA), 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; )

THE SEASONAL EMPLOYER PAC, and ) AF# 4769  
 DELANY, PETER JR. 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;

(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 COMMITTEE, 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.

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.

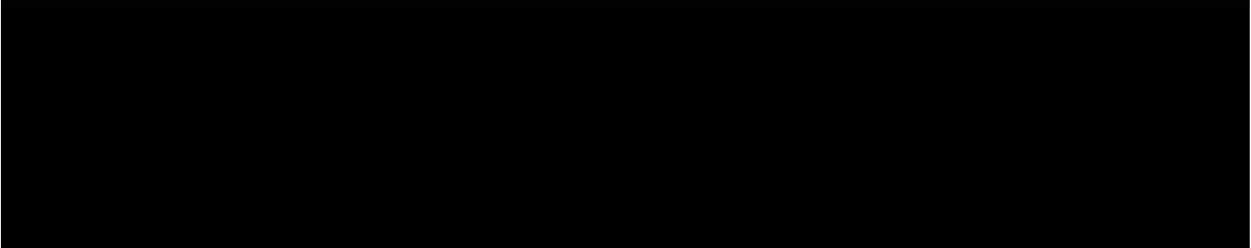


AF#4751 Decided by a vote of 6-0 to: (1) find reason to believe that GEORGIANS PAC, and HEFFRON, KEITH ROBERT in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send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

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.

AF#4759 Decided by a vote of 6-0 to: (1) find reason to believe that MONTANA OUTDOOR VALUES PAC (MOV PAC), 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/ INTN'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 HERSHEY, 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.

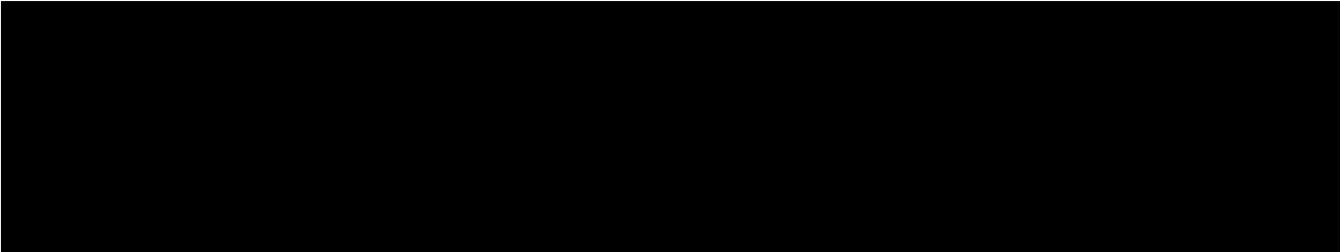
AF#4763 Decided by a vote of 6-0 to: (1) find reason to believe that PHIL ARBALLO FOR CONGRESS, and FAUSONE, PAUL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send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

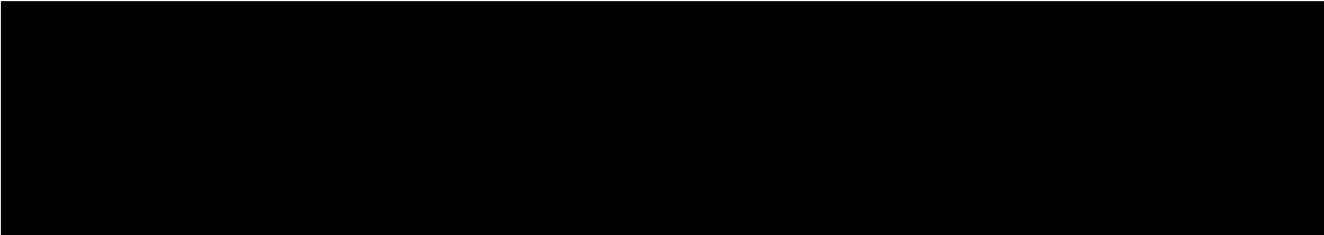
AF#4765 Decided by a vote of 6-0 to: (1) find reason to believe that PLUMBERS & PIPEFITTERS LOCAL UNION 74 POLITICAL ACTION COMMITTEE, and HACKENDORN, MICHAEL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would 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#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#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

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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:



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

Mark Milton, in official capacity as Treasurer  
Path to Freedom PAC  
11004 Manchester Road  
Saint Louis, MO 63122

C00836791  
AF#: 4762  
FINE: \$11,493

Dear Mark Milton,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a July Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. 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 FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On September 10, 2024, the Commission found that there is reason to believe ("RTB") that Path to Freedom PAC 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 \$11,493. 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 \$11,493 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: \$230,153  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

## PATH TO FREEDOM PAC

Page 2 of 4

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

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

If you decide to challenge the RTB finding and/or calculated civil money penalty, you must email a written response to the FEC's Office of Administrative Review at [administrativefines@fec.gov](mailto:administrativefines@fec.gov). Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or 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](mailto:administrativefines@fec.gov). The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the

PATH TO FREEDOM PAC

Page 3 of 4

date they are electronically received by staff.

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

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

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

PATH TO FREEDOM PAC

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

Path to Freedom PAC  
11004 Manchester Road  
St. Louis, MO 63122

October 15, 2024

**VIA EMAIL**

Federal Election Commission  
Washington, DC

RE: Challenge to Civil Money Penalties – AF#: 4762  
Path to Freedom PAC – C00836791

Dear Sir or Madam:

I am writing to challenge the civil penalties asserted in the attached letter dated September 12, 2024, based on the alleged failure to file a July Quarterly Report of Receipts and Disbursements the period of April 1, 2024 through June 30, 2024. This challenge is made because the calculated civil money penalty amount is wrong. The penalty amount was calculated based on the PAC's alleged level of activity of \$230,153. The PAC had no activity during the period at issue, as reflected on the termination report filed on 9/18/2024, which was apparently rejected (see below). The level of activity for the period was \$0, so the correct penalty amount, even for a late filing, should be \$0.

The PAC has not had any activity since the first quarter of 2024. The quarterly report filed on April 13, 2024, showed no cash on hand and the treasurer (me), albeit mistakenly, believed he filed the April quarterly report as the termination report, as the PAC had ceased operations. Apparently, the report was not marked as a termination report, prompting the FEC to assert these civil fines based on the non-filing of the July 15, 2024 quarterly report, which the treasurer did not believe was required because he thought the PAC was terminated in April.

On September 18, 2024, in response to the proposed penalties and after discussing the matter by phone with FEC's Reports Analysis Ben Holly, the Treasurer filed the quarterly termination report for Q2 of 2024. The Treasurer believed this would resolve the issue. By letter dated October 3, 2024, the FEC stated the termination report was rejected because of the pending administrative fines. I'm not sure what to do at this point other than challenge the civil penalties because they are not correct based on the PAC's level of activity during the period at issue.

I ask for your leniency under the circumstances. Please let me know if you need any additional information. Thank you for your time and consideration.

Sincerely,



Mark Milton, in his official capacity as  
Treasurer for Path to Freedom PAC



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

November 26, 2024

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

AF# 4762 – Path to Freedom PAC and Mark Milton, in their official capacity as Treasurer (C00836791)

### **Summary of Recommendation**

Make a final determination in AF# 4762 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 a report disclosing the activity for the period on September 18, 2024, 65 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 \$11,493 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 committee not authorized by a candidate shall file, in an election year, 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(c)(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’ Challenges**

On October 15, 2024, the Commission received the written response (“challenge”) from the Treasurer stating the civil money penalty was calculated based on an incorrect level of activity. Further, the Treasurer explains he mistakenly believed the Committee had submitted its prior

report as a termination report. After the Commission's RTB finding in this matter, the Committee filed the 2024 July Quarterly Report as a termination report and disclosed \$0 in activity for the reporting period.

## 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.<sup>1</sup> The Treasurer acknowledges the Committee did not file a termination report with the Commission until September 18, 2024.<sup>2</sup> Therefore, the Reviewing Officer confirms the respondents were required to file the 2024 July Quarterly Report by July 15, 2024.<sup>3</sup>

At the time of the RTB finding, the Commission used an estimated level of activity (\$230,153) to calculate the penalty because the 2024 July Quarterly Report had not yet been filed. 11 C.F.R. § 111.43(d)(2)(ii). As indicated in the challenge, on September 18, 2024, the Committee filed a report disclosing \$0 in total receipts and \$0 in total disbursements for the reporting period.<sup>4</sup> Therefore, the actual level of activity for the 2024 July Quarterly reporting period is \$0. 11 C.F.R. § 111.43(d)(3)(ii). 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 \$11,493).

## OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 4762 involving Path to Freedom PAC and Mark Milton, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4762 that Path to Freedom PAC and Mark Milton, 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 \$11,493); and
3. Send the appropriate letters.

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

<sup>2</sup> <https://docquery.fec.gov/pdf/716/202409189675524716/202409189675524716.pdf>

<sup>3</sup> 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.

<sup>4</sup> <https://docquery.fec.gov/pdf/716/202409189675524716/202409189675524716.pdf>

**Attachments**

Attachment 1 –

Attachment 2 –

Attachment 3 – Declaration from RAD

Attachment 4 – Declaration from OAR



**DECLARATION OF KRISTIN D. ROSER**

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission (“Commission”). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by RAD’s Filing Notification System to Path To Freedom PAC’s official email address(es) 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 2024 July Quarterly Report (sent via electronic mail to: info@pathtofreedom.us, mark.milton@miltonlawgroup.com and mark.roth@brownwinnick.com);
  - B) Late Notification email, dated July 16, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: info@pathtofreedom.us, mark.milton@miltonlawgroup.com and mark.roth@brownwinnick.com).
4. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Path To Freedom PAC’s official email address of record:
  - A) Termination Denial Letter, dated October 3, 2024, referencing the Termination Report covering April 1, 2024 through June 30, 2024 (sent via electronic mail to: info@pathtofreedom.us and mark.milton@miltonlawgroup.com);

- B) Non-filer Notice, dated August 2, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: info@pathtofreedom.us and mark.milton@miltonlawgroup.com);
- C) Reason-to-Believe Letter, dated September 12, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: info@pathtofreedom.us and mark.milton@miltonlawgroup.com).
5. I hereby certify that I have searched the Commission's public records and find that Path To Freedom PAC filed a Termination Report, which included activity covering the reporting period for the 2024 July Quarterly Report, with the Commission on September 18, 2024.
6. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed on the 31<sup>st</sup> day of October, 2024.

*Kristin D. Roser*

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

**DECLARATION OF RHIANNON MAGRUDER**

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission (“Commission”). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) Political committees not authorized by a candidate which are filing on a quarterly basis shall file, in an election year, 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 Termination Report filed by Path to Freedom PAC. The report includes the 2024 July Quarterly Report coverage period of April 1, 2024 through June 30, 2024 and was electronically filed on September 18, 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 26<sup>th</sup> day of November, 2024.

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



**SUMMARY PAGE  
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

**PATH TO FREEDOM PAC**

Report Covering the Period: From:  /  /  To:  /  /

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <input type="text" value="2024"/>		<input type="text" value="1521.12"/>
(b) Cash on Hand at Beginning of Reporting Period.....	<input type="text" value="0.00"/>	
(c) Total Receipts (from Line 19) .....	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) .....	<input type="text" value="0.00"/>	<input type="text" value="1521.12"/>
7. Total Disbursements (from Line 31) .....	<input type="text" value="0.00"/>	<input type="text" value="1521.12"/>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	<input type="text" value="0.00"/>	
10. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	<input type="text" value="0.00"/>	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information, contact the Federal Election Commission at 800-424-9530 or visit [www.fec.gov](http://www.fec.gov)**

DETAILED SUMMARY PAGE  
of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

PATH TO FREEDOM PAC

Report Covering the Period: From: 04 / 01 / 2024 To: 06 / 30 / 2024

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	0.00	0.00
(ii) Unitemized .....	0.00	0.00
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	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 Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5) .....	0.00	0.00
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received .....	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0.00	0.00
(b) Levin Funds (from Schedule H5) .....	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	0.00	0.00
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	0.00	0.00

**DETAILED SUMMARY PAGE**  
of Disbursements

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share .....	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures .....	0.00	0.00
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	0.00	0.00
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E) .....	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees .....	0.00	0.00
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	0.00	1521.12
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share .....	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds .....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) .....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	0.00	1521.12
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	0.00	1521.12

**DETAILED SUMMARY PAGE**  
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3) .....	0.00	0.00
34. Total Contribution Refunds (from Line 28(d)) .....	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33) .....	0.00	0.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3).....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....	0.00	0.00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

November 26, 2024

Mark Milton, in official capacity as Treasurer  
Path to Freedom PAC  
11004 Manchester Road  
St. Louis, MO 63122

C00836791  
AF# 4762

Dear Treasurer:

On September 10, 2024, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Path to Freedom PAC 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 \$11,493 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](mailto:secretary@fec.gov). The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted responses will be deemed received on the date it is electronically received by staff. Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer’s recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

*Rhiannon Magruder*  
Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review

**RECEIVED**

By Office of the Commission Secretary at 10:47 am, Dec 03, 2024

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

December 3, 2024

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *AP*  
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# 4762 – Path to Freedom PAC and Mark Milton, in their official capacity as Treasurer (C00836791)

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 \$11,493 based on the schedule of penalties at 11 C.F.R. § 111.43. On October 15, 2024, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated November 26, 2024 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference.

The Reviewing Officer confirmed the respondents were required to file the 2024 July Quarterly Report by July 15, 2024. At the time of the RTB finding, the Commission used an estimated level of activity (\$230,153) to calculate the penalty because the 2024 July Quarterly Report had not yet been filed. 11 C.F.R. § 111.43(d)(2)(ii). On September 18, 2024, after RTB, 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 \$11,493). *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). On November 26, 2024, the respondents indicated they would not be submitting a response.

**OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4762 involving Path to Freedom PAC and Mark Milton, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4762 that Path to Freedom PAC and Mark Milton, 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 \$11,493); and
3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) AF 4762  
 Final Determination Recommendation: )  
 Path to Freedom PAC and Mark Milton, )  
 in their official capacity as Treasurer )  
 (C00836791) )

CERTIFICATION

I, Laura E. Sinram, Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 11, 2024, the Commission decided by a vote of 6-0 to take the following actions in AF 4762:

1. Adopt the Reviewing Officer recommendation for AF# 4762 involving Path to Freedom PAC and Mark Milton, in their official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 4762 that Path to Freedom PAC and Mark Milton, 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 \$11,493).
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: 2024.12.11  
 16:28:07 -05'00'




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Laura E. Sinram  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

December 20, 2024

Mark Milton, in official capacity as Treasurer  
Path to Freedom PAC  
11004 Manchester Road  
St. Louis, MO 63122

C00836791  
AF# 4762

Dear Treasurer:

On September 10, 2024, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Path to Freedom PAC 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 \$11,493 in accordance with the schedule of penalties at 11 CFR § 111.43. On October 15, 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 Path to Freedom PAC 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 the 2024 July Quarterly Report filed September 18, 2024 (\$0), assess no civil money penalty in accordance with 11 CFR § 111.43. The Reviewing Officer Recommendation was sent to you on November 26, 2024.

On December 11, 2024, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Path to Freedom PAC and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the level of activity disclosed on the 2024 July Quarterly Report (\$0), assessed no civil money penalty (reduced from the RTB civil money penalty of \$11,493). 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 that reads "Sean J. Cooksey". The signature is written in a cursive style with a large initial 'S'.

Sean J. Cooksey  
Chairman

Attachment