



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
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 (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
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;)	

Federal Election Commission
 Certification for Administrative Fines
 September 10, 2024

Page 2

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;)

Federal Election Commission
 Certification for Administrative Fines
 September 10, 2024

Page 3

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;

(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.

Federal Election Commission
Certification for Administrative Fines
September 10, 2024

Page 5

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.

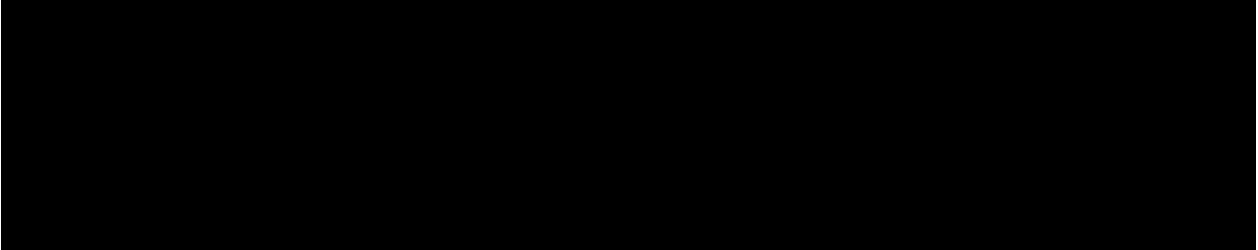
AF#4750 Decided by a vote of 6-0 to: (1) find reason to believe that FRIENDS OF NIKHIL BHATIA, and HERBERT, TIM in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send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

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 (MOVPA), 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#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:

**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

Jodi Sine, in official capacity as Treasurer
Shrewsbury for Senate
POB 82
Fayetteville, WV 25840

C00853242
AF#: 4768
FINE: \$9,725

Dear Jodi Sine,

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 25, 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 Shrewsbury for Senate 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 \$9,725. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The FEC's website contains further information about how the administrative fine program works and how the fines are calculated. See <https://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$9,725 is due within forty (40) days of the finding, or by October 20, 2024, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: \$178,192
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

SHREWSBURY FOR SENATE

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. 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 will be accepted. Electronically submitted challenges will be deemed received on the

SHREWSBURY FOR SENATE

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 Shrewsbury for Senate 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.

SHREWSBURY FOR SENATE

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,

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

Sean J. Cooksey
Chairman

October 11, 2024

To: Federal Election Commission
Office of Administrative Review
administrativefines@fec.gov

Re: AF# 4768

From: Jodi Sine, treasurer
Shrewsbury for Senate
PO Box 82
Fayetteville, WV 25840
ID #: C00853242
EIN: 93-3877447

To Whom It May Concern:

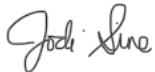
We are writing to challenge the \$9,725 RTB / civil money penalty assessed in the enclosed notice AF# 4768 dated September 12, 2024, for the tax period ending June 30, 2024.

Statement of Facts

Our filing was delayed due to the continued collection of information from donors and other stakeholders, which prevented us from completing the filing within the appropriate timeframe. Our organization wanted to deliver the most accurate information possible, and we would not have been able to submit a completed filing with the hours and data available at the time of the deadline.

Under penalties of perjury, I declare that the facts presented in my statement of disputed issues, which are set out in the accompanying statement of facts, schedules, and other attached statements are, to the best of my knowledge and belief, true, correct, and complete.

Sincerely,



Jodi Sine

Treasurer, Shrewsbury for Senate, legally authorized to act on behalf of the organization.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

December 18, 2024

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

AF# 4768 – Shrewsbury for Senate and Jodi Sine, in their official capacity as Treasurer (C00853242)

Summary of Recommendation

Make a final determination in AF# 4768 that the respondents violated 52 U.S.C. § 30104(a) and assess a \$9,725 civil money penalty.

Reason-to-Believe Background

The 2024 July Quarterly Report was due on July 15, 2024. The respondents filed the report on November 4, 2024, 112 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 \$9,725 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' Challenges

On October 18, 2024, the Commission received the written response ("challenge") from the Treasurer stating that at the time the report was due, the Committee was still collecting

information from donors and stakeholders. If the Committee had filed the report when it was due, it would not have been accurate and complete.

Analysis

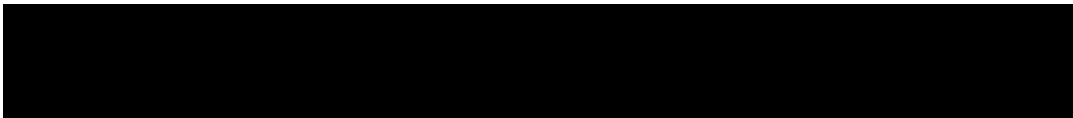
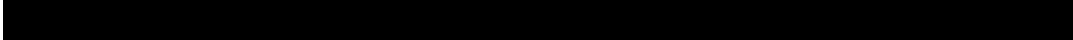
The Treasurer states that the Committee was working to collect financial information at the time the 2024 July Quarterly Report was due on July 15, 2024. The Reviewing Officer notes that despite the Commission sending multiple notifications regarding their requirement to file and their failure to file the 2024 July Quarterly Report¹, the Committee did not file the report until November 4, 2024, after receiving the RTB notification in this matter. Further, there are no records which indicate the Committee contacted RAD regarding their status of filing the 2024 July Quarterly Report. Moreover, the Reviewing Officer notes that the treasurer shall be personally responsible for the timely *and* complete filing of reports *and* for the accuracy of any information or statement contained within. 11 C.F.R. § 104.14(d).

The challenge fails to adequately address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$9,725.

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 4768 involving Shrewsbury for Senate and Jodi Sine, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4768 that Shrewsbury for Senate and Jodi Sine, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$9,725 civil money penalty; and
3. Send the appropriate letter.

Attachments

Attachment 1 – 
 Attachment 2 – 
 Attachment 3 – Declaration from RAD
 Attachment 4 – Declaration from OAR

¹ See Attachments 2 and 3.

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 Shrewsbury for Senate’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 the 2024 July Quarterly Report (sent via electronic mail to: accounting@shrewsburyforsenate.com, brandi@shrewsburyforsenate.com and zshrews@shrewsburyforsenate.com);
 - B) Late Notification email, dated July 16, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: accounting@shrewsburyforsenate.com, brandi@shrewsburyforsenate.com and zshrews@shrewsburyforsenate.com).
4. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Shrewsbury for Senate’s official email addresses of record:
 - A) Termination Denial Letter, dated November 14, 2024, referencing the Termination Report covering July 1, 2024 to September 30, 2024 (sent via electronic mail to: brandi@shrewsburyforsenate.com and zshrews@shrewsburyforsenate.com);

- B) Non-filer Notice, dated August 2, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: brandi@shrewsburyforsenate.com and zshrews@shrewsburyforsenate.com);
- C) Reason-to-Believe Letter, dated September 12, 2024, referencing the 2024 July Quarterly Report (sent via electronic mail to: brandi@shrewsburyforsenate.com and zshrews@shrewsburyforsenate.com).
5. I hereby certify that I have searched the Commission's public records and find Shrewsbury for Senate filed the 2024 July Quarterly Report with the Commission on November 4, 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 14th day of November, 2024.



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

From: fecinfo@fec.gov
 To: [Reports Analysis Division \(RAD\) Staff](#)
 Subject: FEC Late Notification (July Quarterly)
 Date: Tuesday, July 16, 2024 4:55:43 PM

Federal Election Commission - Late Filer Notification

93

93

07/16/2024

Dear Filer,

Committee ID @FECnteid
 Report Type July Quarterly
 Due Date July 15, 2024
 Close of Books June 30, 2024

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-rad/>.

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

Newly registered campaign committees that have not raised or spent more than \$5,000 by the ending coverage date of the 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).

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

Thank you,
 Federal Election Commission

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

Late Notification Email Committee List

#	COMMITTEE ID	COMMITTEE NAME	ANALYST NAME	EMAIL ADDRESSES
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

MS-K

November 14, 2024

JODI SINE, TREASURER
SHREWSBURY FOR SENATE
POB 82
FAYETTEVILLE, WV 25840

IDENTIFICATION NUMBER: C00853242

Dear Treasurer:

On November 4, 2024, you filed a report requesting that the Federal Election Commission permit Shrewsbury for Senate (C00853242) to terminate pursuant to 52 U.S.C. § 30103(d) and 11 C.F.R. § 102.3 of the Commission's Regulations. Because of an administrative fines matter involving your committee, your termination request has been denied.

Your committee must continue to file all required reports with the Commission. You will be notified when your request to terminate has been granted and your committee is no longer required to file reports with the Commission. If you have any questions regarding this matter, please do not hesitate to contact Jamie Sikorsky on our toll-free number at (800) 424-9530. Her local number is (202) 694-1137.

Sincerely,

A handwritten signature in black ink that reads "Debbie Chacona".

Assistant Staff Director
Reports Analysis Division

250



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-7

August 2, 2024

SINE, JODI, TREASURER
SHREWSBURY FOR SENATE
POB 82
FAYETTEVILLE, WV 25840

IDENTIFICATION NUMBER: C00853242

REFERENCE: JULY QUARTERLY REPORT (04/25/2024 - 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.

SHREWSBURY FOR SENATE

Page 2 of 2

Sincerely,

A handwritten signature in black ink that reads "Debbie Chacona". The script is fluid and cursive, with the first name "Debbie" and last name "Chacona" clearly distinguishable.

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 Shrewsbury for Senate. The report includes the coverage period of April 25, 2024 through June 30, 2024 and was electronically filed on November 4, 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 18th day of December, 2024.

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

**FEC
FORM 3****REPORT 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

SHREWSBURY FOR SENATE

ADDRESS (number and street)

576 CALDWELL STREET

Check if different
than previously
reported. (ACC)

PRINCETON

WV

24739

CITY ▲

STATE ▲

ZIP CODE ▲

2. FEC IDENTIFICATION NUMBER ▼

C

C00853242

3. IS THIS
REPORTNEW
(N)

OR

AMENDED
(A)

STATE ▼ DISTRICT

WV

00

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)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

M M /

D D /

Y 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 Y

in the
State of

5. Covering Period

M M /

04

D D /

25

Y Y Y Y Y

2024

through

M M /

06

D D /

30

Y Y Y Y Y

2024

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

Type or Print Name of Treasurer

Sine, Jodi, , ,

Signature of Treasurer

Sine, Jodi, , ,

Date

M M /

11

D D /

04

Y Y Y Y Y

2024

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
Only**FEC FORM 3**
(Revised 05/2016)

SUMMARY PAGE
of Receipts and Disbursements

FEC Form 3 (Revised 03/2016)

Write or Type Committee Name

SHREWSBURY FOR SENATE

Report Covering the Period:

From:

M M / D D / Y Y Y Y
04 25 2024

To:

M M / D D / Y Y Y Y
06 30 2024

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	107254.29	396897.32
(b) Total Contribution Refunds (from Line 20(d))	6600.00	6600.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	100654.29	390297.32
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	146035.59	384931.53
(b) Total Offsets to Operating Expenditures (from Line 14)	86.00	6121.65
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))	145949.59	378809.88
8. Cash on Hand at Close of Reporting Period (from Line 27)	11387.44	
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

SHREWSBURY FOR SENATE

Report Covering the Period:

From:

M = M / D = D / Y = Y = Y = Y
04 / 25 / 2024

To:

M = M / D = D / Y = Y = Y = Y
06 / 30 / 2024**I. RECEIPTS****COLUMN A**
Total This Period**COLUMN B**
Election Cycle-to-Date**11. CONTRIBUTIONS (other than loans) FROM:****(a) Individuals/Persons Other Than
Political Committees****(i) Itemized (use Schedule A)**

22293.84

89870.38

(ii) Unitemized

84960.45

306923.78

**(iii) TOTAL of contributions
from individuals**

107254.29

396794.16

(b) Political Party Committees

0.00

0.00

**(c) Other Political Committees
(such as PACs)**

0.00

0.00

(d) The Candidate

0.00

103.16

(e) TOTAL CONTRIBUTIONS

(other than loans)

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

107254.29

396897.32

**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.)

86.00

6121.65

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)**

107340.29

403018.97

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.....

146035.59

384931.53

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

6600.00

6600.00

(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)).....

6600.00

6600.00

21. OTHER DISBURSEMENTS

100.00

100.00

22. **TOTAL DISBURSEMENTS**

(add Lines 17, 18, 19(c), 20(d), and 21) ►

152735.59

391631.53

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD.....

56782.74

24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3).....

107340.29

25. SUBTOTAL (add Line 23 and Line 24)

164123.03

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22).....

152735.59

27. CASH ON HAND AT CLOSE OF REPORTING PERIOD

(subtract Line 26 from Line 25).....

11387.44



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

December 19, 2024

Jodi Sine, in official capacity as Treasurer
Shrewsbury for Senate
POB 82
Fayetteville, WV 25840

C00853242
AF# 4768

Dear Treasurer:

On September 10, 2024, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Shrewsbury for Senate 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 \$9,725 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess a civil money penalty. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. All written responses and supporting documentation should be converted to PDF (Portable Document Format) and must be emailed to the Commission Secretary at secretary@fec.gov. 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 11:09 am, Jan 22, 2025

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

January 22, 2025

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# 4768 – Shrewsbury for Senate and Jodi Sine, in their official capacity as Treasurer (C00853242)

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 \$9,725 based on the schedule of penalties at 11 C.F.R. § 111.43. On October 18, 2024, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated December 18, 2024 was forwarded to the Commission, a copy was forwarded to the respondents’ counsel, and is hereby incorporated by reference.

The Treasurer stated that the Committee was working to collect financial information at the time the 2024 July Quarterly Report was due on July 15, 2024. The Reviewing Officer noted that the treasurer shall be personally responsible for the timely *and* complete filing of reports *and* for the accuracy of any information or statement contained within. 11 C.F.R. § 104.14(d). The challenge failed to adequately address any of the three valid grounds at 11 C.F.R. § 111.35(b). Therefore, the Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$9,725. *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). The Treasurer has since indicated the Committee will not be submitting a formal response. Therefore, the Reviewing

Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$9,725.

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 4768 involving Shrewsbury for Senate and Jodi Sine, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4768 that Shrewsbury for Senate and Jodi Sine, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$9,725 civil money penalty; and
3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 4768
 Final Determination Recommendation:)
 Shrewsbury for Senate and Jodi Sine, in)
 their official capacity as Treasurer)
 (C00853242))

CERTIFICATION

I, Laura E. Sinram, Secretary and Clerk of the Federal Election
 Commission, do hereby certify that on February 05, 2025, the Commission
 decided by a vote of 5-0 to take the following actions in AF 4768:

1. Adopt the Reviewing Officer recommendation for AF# 4768 involving Shrewsbury for Senate and Jodi Sine, in their official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 4768 that Shrewsbury for Senate and Jodi Sine, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$9,725 civil money penalty.
3. Send the appropriate letter.

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

Attest:

**Laura E
 Sinram**

Digitally signed by Laura
 E Sinram
 Date: 2025.02.10
 11:08:25 -05'00'



Laura E. Sinram
 Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

February 11, 2025

Jodi Sine, in official capacity as Treasurer
Shrewsbury for Senate
POB 82
Fayetteville, WV 25840

C00853242
AF# 4768
\$9,725

Dear Jodi Sine:

On September 10, 2024, the Federal Election Commission (the “Commission” or “FEC”) found reason to believe (“RTB”) that Shrewsbury for Senate 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 \$9,725 in accordance with the schedule of penalties at 11 CFR § 111.43. On October 18, 2024, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission’s RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Shrewsbury for Senate and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assess a civil money penalty in the amount of \$9,725 in accordance with 11 CFR § 111.43. The Reviewing Officer Recommendation was sent to you on December 19, 2024.

On February 5, 2025, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Shrewsbury for Senate and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assessed a civil money penalty in the amount of \$9,725. A copy of the Final Determination Recommendation is attached.

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

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

If you choose to appeal the final determination, you must submit a written petition requesting that the final determination be modified or set aside. This request must be made within thirty (30) days of receipt of this letter and sent to the U.S. District Court for the district in which the committee or you reside or transact business. *See* 52 U.S.C. § 30109(a)(4)(C)(iii). If you did

not timely raise a factual argument in a challenge to the Commission's RTB finding, your right to present such an argument in an appeal to the U.S. District Court under 52 U.S.C. § 30109 shall be deemed waived. 11 CFR § 111.38.

2. If You Choose to Not Pay the Civil Money Penalty and to Not Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701, *et seq.* If you do not pay this debt within thirty (30) days and do not appeal the Commission's final determination to the U.S. District Court (see above), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Treasury will contact you to request payment within five (5) days of the receiving the debt. Treasury currently charges a fee of 30 percent of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32 percent of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency. If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken by Treasury to enforce recovery of a delinquent debt may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, please follow the payment instructions below. You should make payment within thirty (30) days of receipt of this letter.

You may remit payment by Automated Clearinghouse ("ACH") withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form. Please use the details above to complete the required fields.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

Partial Payments

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

Settlement Offers

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

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding this matter, please contact Rhiannon Magruder on our toll-free number (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,

A handwritten signature in black ink, reading "J.E. Trainor, III". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

James E. "Trey" Trainor III
Acting Chairman