



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**SENSITIVE**

September 9, 2024

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

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

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

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

Attached is a list of political committees and their treasurers who failed to file the 2024 July Quarterly Report in accordance with 52 U.S.C. § 30104(a). The July Quarterly Report was due on July 15, 2024.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report [REDACTED] no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

**Recommendation**

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a

preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.

2. Send the appropriate letters.

Federal Election Commission  
 Reason to Believe Circulation Report  
 2024 JULY QUARTERLY Not Election Sensitive 07/15/2024 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4737	C00863530	ADRIAN POKHAREL FOR U.S. CONGRESS	ADRIAN POKHAREL	KESAB BARAL	\$376,635	0	7/29/2024	14	\$67,542	\$2,394
4738	C00859710	AHMED FOR CONGRESS	AHMED MOSTAFA	AHMED MOSTAFA	\$690,737	0		Not Filed	\$230,246 (est)	\$11,493
4739	C00516864	AUSTAL USA LLC FEDERAL POLITICAL ACTION COMMITTEE		LAURA WATERS	\$108,356	0	8/9/2024	25	\$13,530	\$328
4740	C00797340	BLUE CD2 NEW MEXICO USA		MARTHA R. BURT	\$297,925	0		Not Filed	\$99,308 (est)	\$6,188
4741	C00791236	COMMITTEE TO ELECT ANN MARIE DANIMUS	ANN MARIE DANIMUS	ANN MARIE DANIMUS	\$343,793	1	7/25/2024	10	\$75,646	\$3,107
4742	C00869685	COMMITTEE TO ELECT KAREN RENE FOR CONGRESS	KAREN RENE	KARL FORD	\$117,675	0		Not Filed	\$117,675 (est)	\$7,958
4743	C00858928	DIEHL FOR CONGRESS	ABIGAIL DIEHL	KURTIS MICHAUD	\$130,883	0		Not Filed	\$65,442 (est)	\$4,774
4744	C00852483	EISEN FOR NY	JOSHUA EISEN	JOSHUA EISEN	\$555,117	0		Not Filed	\$277,559 (est)	\$14,146
4745	C00851550	ELIAS BASSILE ELECTION COMMITTEE	ELIAS BASSILE	ELIAS BASSILE	\$1,005,337	0		Not Filed	\$335,112 (est)	\$14,146
4746	C00858670	FIGHTING 4 ONE AMERICA PAC		DEREK LEWIS	\$148,000	0		Not Filed	\$148,000 (est)	\$7,958
4747	C00854364	FRIENDS OF BLAKE LYNCH	BLAKE LYNCH	BLAKE LYNCH	\$169,359	0		Not Filed	\$84,680 (est)	\$6,188
4748	C00832477	FRIENDS OF GABRIEL FOR CONGRESS	GABRIEL NJINIMBOT	YVONNE LUMA GWANFOGBE	\$131,710	0	8/14/2024	30	\$18,573	\$358
4749	C00844191	FRIENDS OF KOURI MARSHALL	KOURI MARSHALL	JAMES BRERETON	\$255,604	0		Not Filed	\$63,901 (est)	\$4,774
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
4760	C00383950	NATIONAL ELEVATOR CONSTRUCTORS PAC/ INT'L UNION OF ELEVATOR CONSTRUCTORS (NEC PAC)		LARRY MCGANN	\$1,223,427	0	7/22/2024	7	\$272,508	\$5,124
4761	C00045781	OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE		MICHAEL S. HERSHY	\$117,752	1	7/25/2024	10	\$40,017	\$853
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;	)

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[REDACTED]

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;	)

[REDACTED]

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;	)

[REDACTED]

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;	)

[REDACTED]

PHIL ARBALLO FOR CONGRESS, and	) AF# 4763
FAUSONE, PAUL as treasurer;	)
PHILLIP DRAKE UNITING AMERICA	) AF# 4764
2024, and DRAKE, PHIL as treasurer;	)
PLUMBERS & PIPEFITTERS LOCAL	) AF# 4765
UNION 74 POLITICAL ACTION	)
COMMITTEE, and HACKENDORN,	)
MICHAEL as treasurer;	)
RAJA CHAUDHRY CAMPAIGN, INC.,	) AF# 4766
and ZENO, LEON as treasurer;	)
SANTOS LIMON FOR CONGRESS, and	) AF# 4767
LIMON, SANTOS as treasurer;	)

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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;

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

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

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

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

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

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

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

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AF#4746 Decided by a vote of 6-0 to: (1) find reason to believe that FIGHTING 4 ONE AMERICA PAC, and LEWIS, DEREK in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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

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

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



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

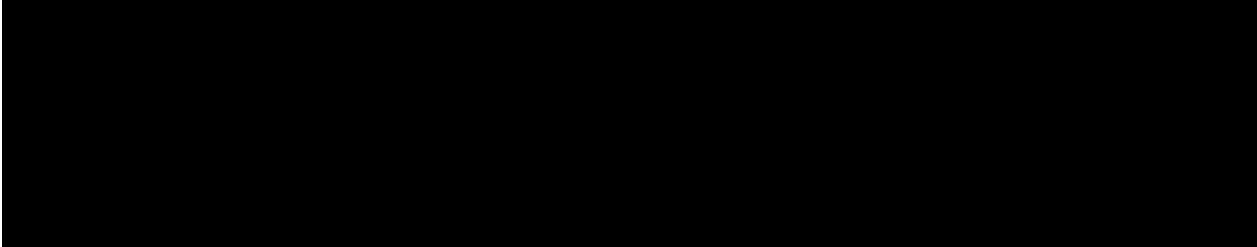
AF#4752 Decided by a vote of 6-0 to: (1) find reason to believe that HOLLY MCCORMACK FOR CONGRESS, and MCCORMACK, HOLLY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary

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

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



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

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

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

AF#4758 Decided by a vote of 6-0 to: (1) find reason to believe that MERIKA COLEMAN FOR CONGRESS, and REED, DEANNA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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

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

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

AF#4764 Decided by a vote of 6-0 to: (1) find reason to believe that PHILLIP DRAKE UNITING AMERICA 2024, and DRAKE, PHIL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

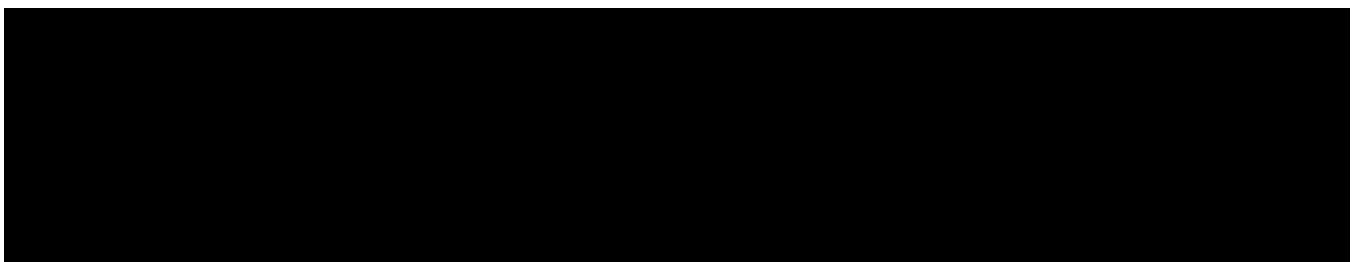
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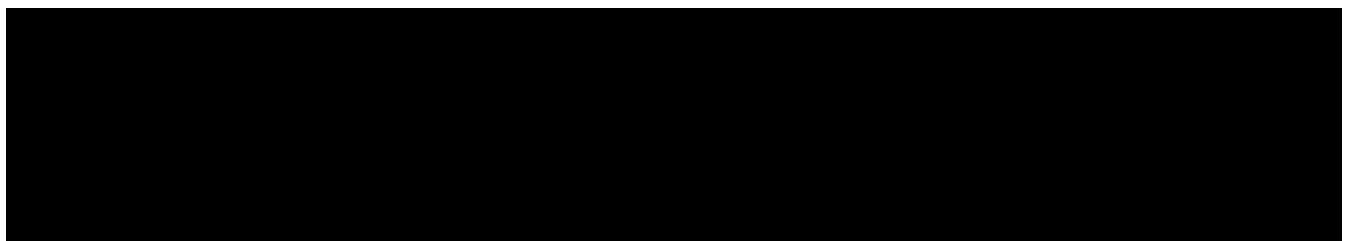
AF#4765 Decided by a vote of 6-0 to: (1) find reason to believe that PLUMBERS & PIPEFITTERS LOCAL UNION 74 POLITICAL ACTION COMMITTEE, and HACKENDORN, MICHAEL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would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

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

AF#4767 Decided by a vote of 6-0 to: (1) find reason to believe that SANTOS LIMON FOR CONGRESS, and LIMON, SANTOS in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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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.

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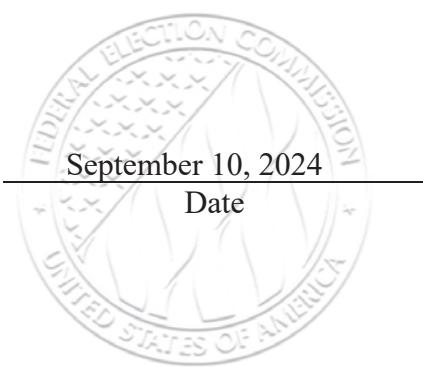
AF#4771 Decided by a vote of 6-0 to: (1) find reason to believe that WEST VIRGINIA FREEDOM BUILDERS INC, and COX, MATTHEW in their official

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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.



September 10, 2024

Date

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

Peter Delany, Jr., in official capacity as Treasurer  
 The Seasonal Employer PAC  
 PO Box 437  
 Ivy, VA 22945

C00626564  
 AF#: 4769  
 FINE: \$3,462

Dear Peter Delany, Jr.,

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). Records at the Federal Election Commission (the "Commission" or "FEC") indicate that this report was filed on July 24, 2024, 9 days late.

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 The Seasonal Employer 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 \$3,462. 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 \$3,462 is due within forty (40) days of the finding, or by October 20, 2024, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
 Level of Activity: \$97,572  
 Number of Days Late: 9  
 Number of Previous Civil Money Penalties Assessed: 2

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

## THE SEASONAL EMPLOYER PAC

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**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 date they are electronically received by staff.

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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 underlying the RTB finding and/or calculated civil money penalty are true and make a final determination that The Seasonal Employer 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.

**Settlement Offers**

## THE SEASONAL EMPLOYER PAC

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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 on the toll-free number, (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,



Sean J. Cooksey  
Chairman

**RECEIVED**

By Office of the Commission Secretary at 10:16 am, Dec 04, 2024



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**SENSITIVE**

December 4, 2024

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the 2024 July Quarterly Report

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2024 July Quarterly Report. The first list represents the committees that have paid the civil money penalty, and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, eleven (11) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Ahmed for Congress (AF 4738) filed the 2024 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than

that assessed at RTB. The committee disclosed total receipts and disbursements of \$9,409 (previously estimated to be \$230,246), thus the fine would be lowered from \$11,493 to \$499.

Blue CD2 New Mexico USA (AF 4740) filed the 2024 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$63,515 (previously estimated to be \$99,308), thus the fine would be lowered from \$6,188 to \$4,774.

Diehl for Congress (AF 4743) filed the 2024 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$24,794 (previously estimated to be \$65,442), thus the fine would be lowered from \$4,774 to \$832.

Eisen for NY (AF 4744) filed the 2024 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$50,050 (previously estimated to be \$277,559), thus the fine would be lowered from \$14,146 to \$4,774.

Elias Bassile Election Committe (AF 4745) disclosed no activity after the RTB finding (previously estimated to be \$335,112), which would result in no civil money penalty (fine previously assessed to be \$14,146).

Fighting 4 One America PAC (AF 4746) disclosed no activity after the RTB finding (previously estimated to be \$148,000), which would result in no civil money penalty (fine previously assessed to be \$7,958).

Friends of Kouri Marshall (AF 4749) filed the 2024 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$7,039 (previously estimated to be \$63,901), thus the fine would be lowered from \$4,774 to \$499.

Georgians PAC (AF 4751) disclosed no activity after the RTB finding (previously estimated to be \$247,590), which would result in no civil money penalty (fine previously assessed to be \$11,493).

Justin Moore for Texas (AF 4757) filed the 2024 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$4,299 (previously estimated to be \$77,677), thus the fine would be lowered from \$6,188 to \$415.

Phil Arballo for Congress (AF 4763) filed the 2024 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$0 (previously estimated to be \$36,126), thus the fine would be lowered from \$1,497 to \$0.

YR Victory Fund (AF 4772) filed the 2024 July Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than

that assessed at RTB. The committee disclosed total receipts and disbursements of \$0 (previously estimated to be \$83,984), thus the fine would be lowered from \$6,188 to \$0.

**RAD Recommendation**

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (3) Send the appropriate letters.

Federal Election Commission  
 FD Circulation Report Fine Paid  
 2024 JULY QUARTERLY Not Election Sensitive 07/15/2024 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
4739	AUSTAL USA LLC FEDERAL POLITICAL ACTION COMMITTEE		C00516864	LAURA WATERS	08/09/2024	25	\$13,530	0	09/10/2024	\$328	\$328	10/15/2024	\$328
4748	FRIENDS OF GABRIEL FOR CONGRESS	GABRIEL NJINIMBOT	C00832477	YVONNE LUMA GWANFOGBE	08/14/2024	30	\$18,573	0	09/10/2024	\$358	\$358	10/03/2024	\$358
4760	NATIONAL ELEVATOR CONSTRUCTORS PAC/ INT'L UNION OF ELEVATOR CONSTRUCTORS (NEC PAC)		C00383950	LARRY MCGANN	07/22/2024	7	\$270,508	0	09/10/2024	\$5,124	\$5,124	09/27/2024	\$5,124
4761	OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE		C00045781	MICHAEL S. HERSHY	07/25/2024	10	\$40,017	1	09/10/2024	\$853	\$853	10/18/2024	\$853
4765	PLUMBERS & PIPEFITTERS LOCAL UNION 74 POLITICAL ACTION COMMITTEE		C00192849	MICHAEL HACKENDORN	08/16/2024	*Not Filed	\$38,705	1	09/10/2024	\$1,871	\$1,871	09/13/2024	\$1,871

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

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2024 JULY QUARTERLY Not Election Sensitive 07/15/2024 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
4737	ADRIAN POKHAREL FOR U.S. CONGRESS	ADRIAN POKHAREL	C00863530	KESAB BARAL	07/29/2024	14	\$67,542	0	09/10/2024	\$2,394	85	\$2,394
4738	AHMED FOR CONGRESS	AHMED MOSTAFA	C00859710	AHMED MOSTAFA	10/17/2024	*Not Filed	\$9,409	0	09/10/2024	\$11,493	85	\$499
4740	BLUE CD2 NEW MEXICO USA		C00797340	MARTHA R. BURT	09/12/2024	*Not Filed	\$63,515	0	09/10/2024	\$6,188	85	\$4,774
4741	COMMITTEE TO ELECT ANN MARIE DANIMUS	ANN MARIE DANIMUS	C00791236	ANN MARIE DANIMUS	07/25/2024	10	\$75,831	1	09/10/2024	\$3,107	85	\$3,107
4742	COMMITTEE TO ELECT KAREN RENE FOR CONGRESS	KAREN RENE	C00869685	KARL FORD		Not Filed	\$117,675 (est)	0	09/10/2024	\$7,958	85	\$7,958
4743	DIEHL FOR CONGRESS	ABIGAIL DIEHL	C00858928	KURTIS MICHAUD	11/19/2024	*Not Filed	\$24,794	0	09/10/2024	\$4,774	85	\$832
4744	EISEN FOR NY	JOSHUA EISEN	C00852483	JOSHUA EISEN	11/20/2024	*Not Filed	\$50,050	0	09/10/2024	\$14,146	85	\$4,774
4745	ELIAS BASSILE ELECTION COMMITTEE	ELIAS BASSILE	C00851550	ELIAS BASSILE		**Not Filed	\$0	0	09/10/2024	\$14,146	85	NONE
4746	FIGHTING 4 ONE AMERICA PAC		C00858670	DEREK LEWIS		**Not Filed	\$0	0	09/10/2024	\$7,958	85	NONE
4747	FRIENDS OF BLAKE LYNCH	BLAKE LYNCH	C00854364	BLAKE LYNCH		Not Filed	\$84,680 (est)	0	09/10/2024	\$6,188	85	\$6,188
4749	FRIENDS OF KOURI MARSHALL	KOURI MARSHALL	C00844191	JAMES BRERETON	09/19/2024	*Not Filed	\$7,039	0	09/10/2024	\$4,774	85	\$499
4751	GEORGIANS PAC		C00815787	KEITH ROBERT HEFFRON		**Not Filed	\$0	0	09/10/2024	\$11,493	85	NONE
4752	HOLLY MCCORMACK FOR CONGRESS	HOLLY MCCORMACK	C00767798	HOLLY MCCORMACK		Not Filed	\$538,205 (est)	5	09/10/2024	\$37,795	85	\$37,795
4753	JOHN CONYERS FOR CONGRESS	JOHN CONYERS	C00804500	OFFICE OF TREASURER		Not Filed	\$56,243 (est)	3	09/10/2024	\$8,354	85	\$8,354
4755	JONES, HERB (US HOUSE)	HERBERT CARROLL JONES, JR.	C00809145	OFFICE OF TREASURER		Not Filed	\$49,357 (est)	4	09/10/2024	\$2,994	85	\$2,994
4756	JOSE CASTILLO FOR CONGRESS	JOSE CASTILLO	C00711358	JOSE CASTILLO	07/29/2024	14	\$42,984	0	09/10/2024	\$815	85	\$815
4757	JUSTIN MOORE FOR TEXAS	JUSTIN MOORE	C00841551	FREDERICK HAYNES III	10/15/2024	*Not Filed	\$4,299	0	09/10/2024	\$6,188	85	\$415
4758	MERIKA COLEMAN FOR CONGRESS	MERIKA COLEMAN	C00853945	DEANNA REED		Not Filed	\$126,024 (est)	0	09/10/2024	\$7,958	85	\$7,958
4763	PHIL ARBALLO FOR CONGRESS	PHIL ARBALLO	C00830505	PAUL FAUSONE	09/27/2024	*Not Filed	\$0	0	09/10/2024	\$1,497	85	NONE
4764	PHILLIP DRAKE UNITING AMERICA 2024	PHILLIP JOSEPH DRAKE	C00839845	PHIL DRAKE		Not Filed	\$342,733 (est)	0	09/10/2024	\$14,146	85	\$14,146
4766	RAJA CHAUDHRY CAMPAIGN, INC.	RAJA CHAUDHRY	C00846840	LEON ZENO		Not Filed	\$193,285 (est)	0	09/10/2024	\$9,725	85	\$9,725
4767	SANTOS LIMON FOR CONGRESS	SANTOS M. LIMON	C00846063	SANTOS LIMON	09/10/2024	*Not Filed	\$29,152	0	09/10/2024	\$1,497	85	\$1,497
4769	THE SEASONAL EMPLOYER PAC		C00626564	PETER DELANY, JR.	07/24/2024	9	\$97,572	2	09/10/2024	\$3,462	85	\$3,462
4771	WEST VIRGINIA FREEDOM BUILDERS INC		C00663898	MATTHEW COX	09/04/2024	*Not Filed	\$98,371	0	09/10/2024	\$6,188	85	\$6,188
4772	YR VICTORY FUND		C00846410	BRANDON PRICHARD	09/12/2024	*Not Filed	\$0	0	09/10/2024	\$6,188	85	NONE

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

\*\* The committee filed a Form 99 (Miscellaneous Electronic Submission) disclosing no activity for the 2024 July Quarterly reporting period.

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)
	)
Administrative Fine Program – Final	)
Determination Recommendation for the	)
2024 July Quarterly Report:	)
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 DR. 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	) AF# 4744
DR. as 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;	)
GEORGIANS PAC, and HEFFRON,	) AF# 4751
KEITH ROBERT as treasurer;	)
HOLLY MCCORMACK FOR	) AF# 4752
CONGRESS, and MCCORMACK,	)
HOLLY as treasurer;	)

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JOHN CONYERS FOR CONGRESS, and	) AF# 4753
OFFICE OF TREASURER;	)
JONES, HERB (US HOUSE), and OFFICE	) AF# 4755
OF TREASURER;	)
JOSE CASTILLO FOR CONGRESS, and	) AF# 4756
CASTILLO, JOSE as treasurer;	)
JUSTIN MOORE FOR TEXAS, and	) AF# 4757
HAYNES, FREDERICK REV DR. III as	)
treasurer;	)
MERIKA COLEMAN FOR CONGRESS,	) AF# 4758
and REED, DEANNA as treasurer;	)
NATIONAL ELEVATOR	) AF# 4760
CONSTRUCTORS PAC/ INT'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;	)
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;	)

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CERTIFICATION

I, Laura E. Sinram, Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 05, 2024 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2024 July Quarterly Report, as recommended in the Reports Analysis Division's Memorandum dated December 04, 2024, on the following committees:

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

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

AF#4739 Decided by a vote of 6-0 to: (1) make a final determination 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 assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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

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AF#4741 Decided by a vote of 6-0 to: (1) make a final determination 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 assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4742 Decided by a vote of 6-0 to: (1) make a final determination 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 assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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

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

AF#4745 Decided by a vote of 6-0 to: (1) make a final determination that ELIAS BASSILE ELECTION COMMITTE, and BASSILE, ELIAS in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4746 Decided by a vote of 6-0 to: (1) make a final determination that FIGHTING 4 ONE AMERICA PAC, and LEWIS, DEREK in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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

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

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

AF#4751 Decided by a vote of 6-0 to: (1) make a final determination that GEORGIANS PAC, and HEFFRON, KEITH ROBERT in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4752 Decided by a vote of 6-0 to: (1) make a final determination that HOLLY MCCORMACK FOR CONGRESS, and MCCORMACK, HOLLY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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

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

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

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

AF#4758 Decided by a vote of 6-0 to: (1) make a final determination that MERIKA COLEMAN FOR CONGRESS, and REED, DEANNA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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

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

AF#4763 Decided by a vote of 6-0 to: (1) make a final determination that PHIL ARBALLO FOR CONGRESS, and FAUSONE, PAUL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil penalty; (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) make a final determination that PHILLIP DRAKE UNITING AMERICA 2024, and DRAKE, PHIL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4765 Decided by a vote of 6-0 to: (1) make a final determination 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 assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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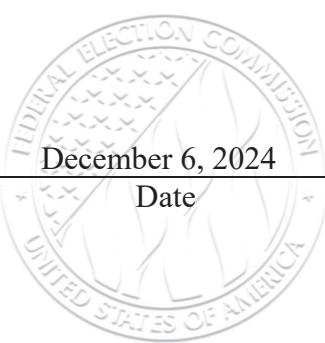
AF#4766 Decided by a vote of 6-0 to: (1) make a final determination that RAJA CHAUDHRY CAMPAIGN, INC., and ZENO, LEON in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard,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

AF#4767 Decided by a vote of 6-0 to: (1) make a final determination that SANTOS LIMON FOR CONGRESS, and LIMON, SANTOS in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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

AF#4771 Decided by a vote of 6-0 to: (1) make a final determination that WEST VIRGINIA FREEDOM BUILDERS INC, and COX, MATTHEW in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4772 Decided by a vote of 6-0 to: (1) make a final determination that YR VICTORY FUND, and PRICHARD, BRANDON in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.



December 6, 2024

Date

Attest:

**Laura E  
Sinram**

Digitally signed by  
 Laura E Sinram  
 Date: 2024.12.06  
 18:31:48 -05'00'

Laura E. Sinram  
 Secretary of Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

AF

December 9, 2024

Peter Delany, Jr., in official capacity as Treasurer  
 The Seasonal Employer PAC  
 PO Box 437  
 Ivy, VA 22945

C00626564

AF#: 4769  
 FINE: \$3,462

Dear Peter Delany, Jr.,

On September 10, 2024, the Federal Election Commission (the "Commission" or "FEC") found reason to believe ("RTB") that The Seasonal Employer PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2024 July Quarterly Report. By letter dated September 12, 2024, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$3,462, in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the Commission's RTB finding, you, in your official capacity as treasurer, were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The Commission made a final determination on December 5, 2024 that The Seasonal Employer PAC 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 \$3,462, in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$97,572

Number of Days Late: 9

Number of Previous Civil Money Penalties Assessed: 2

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**

## THE SEASONAL EMPLOYER PAC

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If you choose to appeal the final determination, you must submit a written petition, within thirty (30) days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). If you did not timely raise a factual argument in a challenge to the Commission's RTB finding, your right to present such an argument in an appeal to the U.S. District Court under 52 U.S.C. § 30109 shall be deemed waived. 11 CFR § 111.38.

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

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

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

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

## **3. If You Choose to Pay the Civil Money Penalty**

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

You may remit payment by Automated Clearinghouse ("ACH") withdrawal from your

## THE SEASONAL EMPLOYER PAC

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bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit <http://www.fec.gov/af/pay.shtml> to be directed to Pay.gov's Administrative Fine Program Payment form. Please use the details above to complete the required fields.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS****Partial Payments**

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

**Settlement Offers**

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

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

If you have any questions regarding the payment of the civil money penalty, please contact Ben Holly on the toll-free number, (800) 424-9530 (at the prompt, press 5 to reach the Reports Analysis Division) or (202) 694-1130.

On behalf of the Commission,



Sean J. Cooksey  
Chairman

THE SEASONAL EMPLOYER PAC

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