SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

February 3, 2025

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: Reason To Believe Recommendation – 2024 30-Day Post-General Report (Authorized Committees) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2024 30-Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The 30-Day Post-General Report was due on December 5, 2024. The list is comprised of authorized committees whose candidates sought election in the November 5th General Election.

The committees listed on 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 POST-GENERAL Not Election Sensitive 12/05/2024 AUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4844	C00838748	ALEX BALEKIAN FOR CONGRESS	ALEX ARTO BALEKIAN	ALEX ARTO BALEKIAN	$734,514	0		Not Filed	$104,931 (est)	$8,165
[redacted]										
4846	C00803486	EUGENE YU FOR CONGRESS DISTRICT 4	EUGENE CHIN YU	VANESSA E. ARRIOLA	$110,815	0	12/14/2024	9	$6,852	$139
[redacted]										
4848	C00841098	RON QUINCE FOR CONGRESS	RONALD QUINCE	SUSAN RAMOS	$2,042,962	0		Not Filed	$408,592 (est)	$16,327
4849	C00846063	SANTOS LIMON FOR CONGRESS	SANTOS M. LIMON	SANTOS LIMON	$223,456	2		Not Filed	$44,691 (est)	$2,304
[redacted]										
4851	C00842757	THOMAS COLE FOR CONGRESS	THOMAS COLE	THOMAS COLE	$123,092	0		Not Filed	$15,387 (est)	$854
[redacted]										

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reason To Believe Recommendation –	)	
2024 30-Day Post-General Report	)	
(Authorized Committees) for the	)	
Administrative Fine Program:	)	
ALEX BALEKIAN FOR CONGRESS, and	)	AF# 4844
BALEKIAN, ALEX ARTO as treasurer;	)	
[redacted]		
EUGENE YU FOR CONGRESS	)	AF# 4846
DISTRICT 4, and ARRIOLA, VANESSA	)	
E as treasurer;	)	
[redacted]		
RON QUINCE FOR CONGRESS, and	)	AF# 4848
RAMOS, SUSAN as treasurer;	)	
SANTOS LIMON FOR CONGRESS, and	)	AF# 4849
LIMON, SANTOS as treasurer;	)	
[redacted]		
THOMAS COLE FOR CONGRESS, and	)	AF# 4851
COLE, THOMAS as treasurer;	)	

CERTIFICATION

I, Laura E. Sinram, Secretary and Clerk of the Federal Election Commission, do hereby certify that on February 05, 2025 the Commission took the following actions on the Reason To Believe Recommendation – 2024 30-Day Post-General Report (Authorized Committees) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated February 03, 2025, on the following committees:

AF#4844 Decided by a vote of 5-0 to: (1) find reason to believe that ALEX BALEKIAN FOR CONGRESS, and BALEKIAN, ALEX ARTO 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, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

[redacted]

AF#4846 Decided by a vote of 5-0 to: (1) find reason to believe that EUGENE YU FOR CONGRESS DISTRICT 4, and ARRIOLA, VANESSA E 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, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

[redacted]

AF#4848 Decided by a vote of 5-0 to: (1) find reason to believe that RON QUINCE FOR CONGRESS, and RAMOS, SUSAN 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, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4849 Decided by a vote of 5-0 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, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

[redacted]

[redacted]

AF#4851 Decided by a vote of 5-0 to: (1) find reason to believe that THOMAS COLE FOR CONGRESS, and COLE, THOMAS 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, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

February 10, 2025
Date

Attest:

Laura E Sinram

Digitally signed by Laura E Sinram
Date: 2025.02.10 16:37:17 -05'00'

Laura E. Sinram
Secretary and Clerk of the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

February 12, 2025

Thomas Cole, in official capacity as Treasurer
Thomas Cole for Congress
815 Alston Road
Santa Barbara, CA 93108

C00842757
AF#: 4851
FINE: $854

Dear Thomas Cole,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 2024 30-Day Post-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled general election for which the candidate sought election. This report, covering the period October 17, 2024 through November 25, 2024 shall be filed no later than December 5, 2024. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission (the "Commission" or "FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On February 5, 2025, the Commission found that there is reason to believe ("RTB") that Thomas Cole for Congress 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 December 5, 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 $854. 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 $854 is due within forty (40) days of the finding, or by March 17, 2025, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: $15,387
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

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 March 17, 2025. 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 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 Thomas Cole for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

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

3. If You Choose to Pay the Civil Money Penalty

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

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

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,

James E. "Trey" Trainor III
Acting Chairman

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

April 21, 2025

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 KDR/Jamie Sikorsky JS
Reports Analysis Division
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the 2024 30-Day Post-General Report (Authorized Committees)

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 30-Day Post-General 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, two (2) 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.

Alex Balekian for Congress (AF 4844) filed the 2024 30-Day Post-General 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 $95,699 (previously estimated to be $104,931), thus the fine would be lowered from $8,165 to $6,349.

Thomas Cole for Congress (AF 4851) filed the 2024 30-Day Post-General Report after the RTB finding and disclosed total receipts and disbursements of $0 (previously estimated to be $15,387) which would result in no civil money penalty (fine previously assessed to be $854).

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 its treasurer, in their official capacity, listed on the attached report 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 POST-GENERAL Not Election Sensitive 12/05/2024 AUTH

AF#	Committee ID	Committee Name	Cand ID	Candidate Name	Treasurer	Receipt Date	Days Late	LOA	Previous Violations	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
4846	C00803486	EUGENE YU FOR CONGRESS DISTRICT 4	H4GA12051	EUGENE CHIN YU	VANESSA E. ARRIOLA	12/14/2024	9	$6,852	0	2/5/2025	$139	$139	3/26/2025	$139

Federal Election Commission
FD Circulation Report - Fine Not Paid
2024 POST-GENERAL Not Election Sensitive 12/05/2024 AUTH

AF#	Committee ID	Committee Name	Cand ID	Candidate Name	Treasurer	Receipt Date	Days Late	LOA	Previous Violations	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
4844	C00838748	ALEX BALEKIAN FOR CONGRESS	H4CA30230	ALEX ARTO BALEKIAN	ALEX ARTO BALEKIAN	3/31/2025	*Not Filed	$95,699	0	2/5/2025	$8,165	75	$6,349
[redacted]													
4848	C00841098	RON QUINCE FOR CONGRESS	H4NV01211	RONALD QUINCE	SUSAN RAMOS	4/16/2025	*Not Filed	$1,293,200	0	2/5/2025	$16,327	75	$16,327
4849	C00846063	SANTOS LIMON FOR CONGRESS	H4TX23138	SANTOS M. LIMON	SANTOS LIMON		Not Filed	$44,691 (est)	2	2/5/2025	$2,304	75	$2,304
4851	C00842757	THOMAS COLE FOR CONGRESS	H4CA24191	THOMAS COLE	THOMAS COLE	2/5/2025	*Not Filed	$0	0	2/5/2025	$854	75	NONE

* 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	)	
	)	AF 4851
Administrative Fine Program – Final Determination Recommendation for the 2024 30-Day Post-General Report (Authorized Committees): Thomas Cole for Congress and Thomas Cole, in their official capacity as Treasurer	)	

AMENDED CERTIFICATION

I, Laura E. Sinram, Secretary and Clerk of the Federal Election Commission, do hereby certify that on May 09, 2025, the Commission decided by a vote of 4-0 to take the following actions in AF 4851:

1. Make a final determination that Thomas Cole for Congress and Thomas Cole, in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) with no activity and will not be assessed a civil money penalty.

2. Send the appropriate letter.

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

May 13, 2025
Date

Attest:

Laura E Sinram

Digitally signed by Laura E Sinram
Date: 2025.05.13 11:57:03 -04'00'

Laura E. Sinram
Secretary and Clerk of the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

May 13, 2025

Thomas Cole, in official capacity as Treasurer
Thomas Cole for Congress
815 Alston Road
Santa Barbara, CA 93108

C00842757

AF#: 4851

Dear Thomas Cole,

On February 5, 2025, the Federal Election Commission ("the Commission" or "FEC") found reason to believe ("RTB") that Thomas Cole for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2024 Post-General Report. By letter dated February 12, 2025, the Commission notified you of the RTB finding and the preliminary civil money penalty calculated at the RTB stage to be $854, in accordance with the schedule of penalties at 11 CFR § 111.43.

Since that time, the amount of the civil money penalty has been changed to reflect the actual level of activity of the Post-General Report. The Commission made a final determination on May 9, 2025 that Thomas Cole for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed no civil money penalty in accordance with 11 CFR § 111.43, and voted to close the file.

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 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,

James E. "Trey" Trainor III
Acting Chairman