



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

February 28, 2025

Kate Sawyer Keane, Esq.
250 Massachusetts Ave., Suite 400
Washington, DC 20001

Re: ADR 1186 (24L-34)
VDUSS PAC and Lauren Decot Lee, Treasurer (C00590489)

Dear Ms. Keane:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on February 26, 2025 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is attached.

Under the terms of the agreement, a civil penalty in the amount of \$14,875 is due on March 28, 2025. Kindly review the attached payment instructions for details on payment methods and the collection of unpaid debts.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua Rebollozo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Joshua A. Rebollozo
Assistant Director
Alternative Dispute Resolution Office

Enc: Payment Instructions
Compliance Chart
Negotiated Settlement

ADRO Civil Penalty Payment Instructions

You may remit payment by credit card, debit card, or ACH withdrawal from your bank account through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/adrpayment to be directed to Pay.gov's FEC ADR Payment form.

Unpaid Civil Penalties

Unpaid civil money penalties 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 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% 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% 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 ("PCA"). 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.

ADR 1186 Compliance Chart**Type**

Certify the closure of the Committee's federal account and work with Commission staff to terminate its political committee status

Date Due

March 28, 2025



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

Case Number: ADR 1186

Source: RAD 24L-34

Case Name: VDUSS PAC

NEGOTIATED SETTLEMENT

This matter was initiated by the Federal Election Commission (FEC or the Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Commission entered into negotiations with Kate Sawyer Keane, Esq., and Zachary Morrison, Esq., representing VDUSS PAC¹ and Lauren Decot Lee, in the official capacity of Treasurer (the Committee or Respondents). It is understood that this settlement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral. The parties agree to resolve the matter according to the following terms:

1. The Commission enters into this settlement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this settlement with the Commission.
3. The Reports Analysis Division (RAD) referred Respondents for failing to remedy excessive and prohibited 2022 primary and general election contributions, totaling \$198,490.04, within the permissible timeframe. All of these contributions have been remedied outside of the permissible timeframe.
4. It is unlawful for any national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office, and it is unlawful for any candidate or political committee to accept such contributions. 52 U.S.C. §§ 30116(f), 30118(a); 11 C.F.R. § 114.2(a), (d). A contribution from an LLC is considered an unlawful corporate contribution if the LLC elects to be treated as a corporation under IRS rules or if its shares are traded publicly. 11 C.F.R. §110.1(g)(3). Within 30 days of the treasurer's receipt of the questionable contribution, the committee must confirm the legality of the contribution or refund the contribution to the contributor and note the refund on the report covering the period in which the refund was made. 11 CFR §103.3(b)(1).

¹ On November 21, 2023, the Committee filed an Amended Statement of Organization (Form 1) to convert the committee type from a Principal Campaign Committee to a Political Action Committee. On October 31, 2023, the Committee filed an Amended Form 1 changing the committee name from Val Demings for U.S. Senate to VDUSS PAC.

5. Unregistered organizations must demonstrate through a reasonable accounting method that the organization received sufficient funds subject to the limitations and prohibitions of the FECA to make a contribution. 11 C.F.R. § 102.5(b). The treasurer of a political committee is responsible for ensuring that contributions received from unregistered organizations were made with permissible funds. 11 C.F.R. § 103.3(b).
6. During the 2021-2022 election cycle, no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$2,900. No multicandidate political committee shall make contributions to any other political committee in any calendar year which exceed \$5,000. 52 U.S.C. § 30116 (a); 11 C.F.R. §§ 110.1(b), (d).
7. Affiliated committees that are established, financed, maintained, or controlled by the same corporation, labor organization, person, or group of persons share a single contribution limitation on the amount they can accept from any one contributor. 11 C.F.R. §§ 110.3(a)(1), (a)(3)(ii).
8. The Committee states it was unable to identify excessive contributions within the permissible period largely due to a software issue. In response, the Committee ceased using the software to process contributor information after the 2022 election concluded and ultimately refunded all contributions at issue, albeit untimely. The Committee first filed a termination report on August 21, 2024, because the Committee fulfilled its purpose and wishes to terminate its political committee status as soon as possible.
9. Respondents, in order to resolve this matter, agree to pay a civil penalty of \$14,875 within thirty (30) days of the effective date of this settlement. As the Committee wishes to terminate its political committee status, Respondents will certify the closure of the Committee's federal account and file an updated termination report within thirty (30) days of the effective date of this settlement, and work with Commission staff to terminate their political committee status and reporting obligations. The Committee will continue reporting until such time as the termination has been approved.
10. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this settlement under penalty of perjury pursuant to 28 U.S.C. § 1746.
11. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance. Unpaid civil money penalties are subject to the Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. § 3701 et seq. The Commission will transfer debt to the United States Department of the Treasury (Treasury) for collection.
12. This settlement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this settlement as set forth above and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.

13. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 1186 (RAD 24L-34), and resolves those issues identified above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

FOR THE COMMISSION:

Joshua A. Rebollozo, Assistant Director
Alternative Dispute Resolution Office



02/26/2025

Date Signed

FOR THE RESPONDENTS:

Kate Sawyer Keane
Kate Sawyer Keane (Jan 24, 2025 15:37 EST)
Kate Sawyer Keane, Esq.
Representing VDUSS PAC and Lauren
Decot Lee, Treasurer

01/24/2025

Date Signed