

MUR 8336

RECEIVED

FEDERAL ELECTION COMMISSION

AFFIDAVIT OF PATRICIA A. DAVIS

OCTOBER 24, 2024 1:30 PM

OFFICE OF GENERAL COUNSEL

I. STATEMENT OF FACT

"A formal complaint should contain a clear and concise recitation of the facts describing the violation of a statute or law over which the Commission has jurisdiction." (11 C.F.R. § 111.4)

A. I reviewed the Q2 and Q3 filings for Gary Grasso, Republican candidate for US House of Representatives for the 6th Congressional District of Illinois, Committee ID C00799247 named as "GRASSO FOR CONGRESS 6." These filings are available here: Q2 <https://docquery.fec.gov/cgi-bin/forms/C00799247/1794780/> and Q3 <https://docquery.fec.gov/cgi-bin/forms/C00799247/1794780/> and are attached.

I, complainant Patricia A. Davis, allege that the above-named candidate did not truthfully file his regularly-scheduled Q2 (filed 7/9/2024) and Q3 (filed 10/15/2024) as regarding his repayment of his loans to his committee, or lack thereof.

On its July 2024 Quarterly statement (Q2), the committee shows the candidate loaned his committee \$100,000 on 1/14/2022 and another \$150,000 on 6/8/2022. The Q2 shows the total amount of these two loans, \$250,000. See <https://docquery.fec.gov/cgi-bin/forms/C00799247/1794780/sc/10>

However, on its October 2024 Quarterly statement (Q3), the committee has not declared that the \$150,000 loan was repaid, only the \$100,000 loan is declared as unpaid and still owed. See <https://docquery.fec.gov/cgi-bin/forms/C00799247/1825970/sc/10>

What has happened to that \$150,000 loan to the committee?

B. I reviewed the Q2 and Q3 filings for this committee's "Cash On Hand."

I, complainant Patricia A. Davis, allege that the above-named candidate did not truthfully file his regularly-scheduled Q2 (filed 7/9/2024) and Q3 (filed 10/15/2024) as regarding the committee's "Cash On Hand" totals.

On its July 2024 Quarterly statement (Q2) the committee reports \$1,558.58 cash on hand at the end of the reporting period.

However, on its October Quarterly statement (Q3) the committee shows \$54,511.25 cash on hand at the end of the reporting period. But the committee shows no receipts or any other influx of money, a discrepancy of \$62,952.67. No amendments have been filed to date.

How does this committee explain the income discrepancy with no receipts?

(II. DOCUMENTATION and III. COMPLAINANT AND RESPONDENT INFORMATION follows on next page)

II. DOCUMENTATION

“A formal complaint should be accompanied by supporting documentation if known and available to the person making the complaint.” (11 C.F.R. § 111.)

Attachments as follows:

1. Copy of committee’s Q2 July Quarterly filing on 7/9/2024 (FEC-1794780) showing accrued unpaid loans totaling \$250,000 (Line 10) and end-of-period cash on hand of \$1,558.58 (Line 27);
2. Copy of committee’s Q3 October Quarterly filing on 10/15/2024 (FEC-1825970) showing an unpaid loan of \$100,000 but no repayment of the \$150,000 loan (Lines 9, 10) and end-of-period cash on hand of \$64,511.25 (Line 27).

III. COMPLAINANT AND RESPONDENT INFORMATION

“A formal complaint must be in writing” (52 U.S.C. § 30109(a)(1))

“A formal complaint must contain the full name and address of the person making the complaint.” (11 C.F.R. § 111.4)

“A formal complaint should clearly identify as a respondent each person or entity who is alleged to have committed a violation.” (11 C.F.R. § 111.4)

I, complainant Patricia A. Davis, reside at 26 Pine Tree Lane, Burr Ridge, Illinois 60527.

Respondents are:

1. Gary A. Grasso, 6030 S. Grant St., Burr Ridge, IL 60527 (312-498-3202),
ggrasso@grassolaw.com
2. Ms. Christen Korzyniewski, Treasurer, GRASSO FOR CONGRESS 6, 4317 DuBois Blvd., Brookfield, IL, 60513 (708-567-0578; work: 630-654-4500),
ckorzyniewski@grassolaw.com

(IV. SWORN STATEMENT AND AFFIANT NOTARIZATION follows on next page)

IV. SWORN STATEMENT AND AFFIANT NOTARIZATION

“Contents must be sworn to and signed in the presence of a notary public and shall be notarized. (52 U.S.C. § 30109(a)(1); 11 C.F.R. § 111.4(b)(2)) The notary must indicate as part of the jurat that such swearing occurred.”

I, PATRICIA A. DAVIS, BEING SWORN BY THE NOTARY, HEREBY ATTEST THAT THE INFORMATION IN THIS STATEMENT ABOVE IS A COMPLETE REPRESENTATION OF THE FACTS TO THE BEST OF MY KNOWLEDGE.



10-24-24

AFFIANT SIGNATURE AND DATE



10/24/24

NOTARY SIGNATURE AND DATE

Patricia A. Davis

Burr Ridge, IL 60527

Patti@davismedpr.com

SEAL:



FEC FORM 3**REPORT OF RECEIPTS AND
DISBURSEMENTS****For An Authorized Committee****FILING FEC-1794780****1. Grasso for Congress 6**38 Blaine Street
Hinsdale, Illinois 60521**State is Illinois in District: 6****2. FEC Committee ID #: C00799247****3. This report is NOT an AMENDMENT****4. Report Type = JUL QUARTERLY**

Filed 07/09/2024

SUMMARY PAGE**DETAILED SUMMARY PAGE****Schedule C Filings (LOAN INFORMATION)****(End FEC FORM 3)****SUMMARY PAGE****Of Receipts And Disbursements**

5. Covering Period 04/01/2024 Through 06/30/2024

	Column A This Period	Column B Election Cycle-To- Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans)	0.00	375117.00
(b) Total Contribution Refunds	0.00	0.00
(c) Net Contributions (6(a) - 6(b))	0.00	375117.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures	0.00	632673.13
(b) Total Offsets to Operating Expenditures	0.00	0.00

	Column A This Period	Column B Election Cycle-To- Date
(c) Net Operating Expenditures	0.00	632673.13
8. Cash on Hand at Close of Reporting Period	1558.58	
9. Debts and Obligations Owed TO the Committee	0.00	
Itemize all on SCHEDULE C or SCHEDULE D		
10. Debts and Obligations Owed BY the Committee	250000.00	
Itemize all on SCHEDULE C or SCHEDULE D		

Treasurer: Christen Korzyniewski
Date Signed: 07/09/2024

(End Summary Page, FEC FORM 3)

DETAILED SUMMARY PAGE

Of Receipts And Disbursements

	Column A This Period	Column B Election Cycle-To- Date	Column C Post- Election
I. RECEIPTS			
11. Contributions (other than loans) From:			
(a) Individuals/Persons Other than Political Committees			
(i) Itemized	0.00		
(ii) Unitemized	0.00		
(iii) Total Of Contributions From Individuals	0.00	362967.00	0.00
(b) Political Party Committees	0.00	0.00	0.00
(c) Other Political Committees (such as PACS)	0.00	12150.00	0.00
(d) The Candidate	0.00	0.00	0.00
(e) Total Contributions (11(a) (iii) + (b) + (c))	0.00	375117.00	0.00
12. Transfers From Other Authorized Committees	0.00	10000.00	0.00
13. Loans			
(a) Made Or Guaranteed By The Candidate	0.00	250000.00	0.00
(b) All Other Loans	0.00	0.00	0.00
(c) Total Loans ((a) + (b))	0.00	250000.00	0.00
14. Offsets to Operating Expenditures (Refunds, Rebates, etc)	0.00	0.00	0.00
15. Other Receipts	0.00	0.00	0.00

	Column A This Period	Column B Election Cycle-To-Date	Column C Post-Election
16. Total Receipts (11(e) + 12 + 13(c) + 14 + 15)	0.00	635117.00	0.00
II. DISBURSEMENTS			
17. Operating Expenditures	0.00	632673.13	0.00
18. Transfers to Other Authorized Committees	0.00	0.00	0.00
19. Loan Repayments:			
(a) Of Loans Made or Guaranteed by the Candidate	0.00	0.00	0.00
(b) Of All Other Loans	0.00	0.00	0.00
(c) Total Loan Repayments ((a) + (b))	0.00	0.00	0.00
20. Refunds of Contributions To:			
(a) Individuals/Persons Other Than Political Committees	0.00	0.00	0.00
(b) Political Party Committees	0.00	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00	0.00
(d) Total Contribution Refunds (28(a) + (b) + (c))	0.00	0.00	0.00
21. Other Disbursements	0.00	0.00	0.00
22. Total Disbursements (17 + 18 + 19(c) + 20(d) + 21)	0.00	632673.13	0.00
III. CASH SUMMARY			
23. Cash On Hand At Beginning Of Reporting Period		1558.58	
24. Total Receipts This Period (line 16)	0.00	635117.00	0.00
25. Subtotal (23 + 24)		1558.58	
26. Total Disbursements This Period (line 22)	0.00	632673.13	0.00
27. Cash On Hand At Close Of The Reporting Period (25 - 26)		1558.58	

(End Detailed Summary Page, FEC FORM 3)

Generated Thu Oct 24 12:20:36 2024

FEC FORM 3**REPORT OF RECEIPTS AND
DISBURSEMENTS****For An Authorized Committee****FILING FEC-1825970****1. GrassoforCongress6**38 Blaine Street
Hinsdale, Illinois 60521**State is in District: 0****2. FEC Committee ID #: C00799247****3. This report is NOT an AMENDMENT****4. Report Type = OCT QUARTERLY**

Filed 10/15/2024

SUMMARY PAGE**DETAILED SUMMARY PAGE****Schedule C Filings (LOAN INFORMATION)****(End FEC FORM 3)****SUMMARY PAGE****Of Receipts And Disbursements**

5. Covering Period 07/01/2024 Through 09/30/2024

	Column A This Period	Column B Election Cycle-To- Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans)	0.00	0.00
(b) Total Contribution Refunds	0.00	0.00
(c) Net Contributions (6(a) - 6(b))	0.00	0.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures	0.00	34488.75
(b) Total Offsets to Operating Expenditures	0.00	0.00

	Column A This Period	Column B Election Cycle-To- Date
(c) Net Operating Expenditures	0.00	34488.75
8. Cash on Hand at Close of Reporting Period	64511.25	
9. Debts and Obligations Owed TO the Committee	0.00	
Itemize all on SCHEDULE C or SCHEDULE D		
10. Debts and Obligations Owed BY the Committee	100000.00	
Itemize all on SCHEDULE C or SCHEDULE D		

Treasurer: Christen Korzyniewski

Date Signed: 10/15/2024

(End Summary Page, FEC FORM 3)**DETAILED SUMMARY PAGE****Of Receipts And Disbursements**

	Column A This Period	Column B Election Cycle-To- Date	Column C Post- Election
I. RECEIPTS			
11. Contributions (other than loans) From:			
(a) Individuals/Persons Other than Political Committees			
(i) Itemized	0.00		
(ii) Unitemized	0.00		
(iii) Total Of Contributions From Individuals	0.00	0.00	0.00
(b) Political Party Committees	0.00	0.00	0.00
(c) Other Political Committees (such as PACS)	0.00	0.00	0.00
(d) The Candidate	0.00	0.00	0.00
(e) Total Contributions (11(a) (iii) + (b) + (c))	0.00	0.00	0.00
12. Transfers From Other Authorized Committees	0.00	0.00	0.00
13. Loans			
(a) Made Or Guaranteed By The Candidate	0.00	100000.00	0.00
(b) All Other Loans	0.00	0.00	0.00
(c) Total Loans ((a) + (b))	0.00	100000.00	0.00
14. Offsets to Operating Expenditures (Refunds, Rebates, etc)	0.00	0.00	0.00
15. Other Receipts	0.00	0.00	0.00

	Column A This Period	Column B Election Cycle-To- Date	Column C Post- Election
16. Total Receipts (11(e) + 12 + 13(c) + 14 + 15)	0.00	100000.00	0.00
II. DISBURSEMENTS			
17. Operating Expenditures	0.00	34488.75	0.00
18. Transfers to Other Authorized Committees	0.00	1000.00	0.00
19. Loan Repayments:			
(a) Of Loans Made or Guaranteed by the Candidate	0.00	0.00	0.00
(b) Of All Other Loans	0.00	0.00	0.00
(c) Total Loan Repayments ((a) + (b))	0.00	0.00	0.00
20. Refunds of Contributions To:			
(a) Individuals/Persons Other Than Political Committees	0.00	0.00	0.00
(b) Political Party Committees	0.00	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00	0.00
(d) Total Contribution Refunds (28(a) + (b) + (c))	0.00	0.00	0.00
21. Other Disbursements	0.00	0.00	0.00
22. Total Disbursements (17 + 18 + 19(c) + 20(d) + 21)	0.00	35488.75	0.00
III. CASH SUMMARY			
23. Cash On Hand At Beginning Of Reporting Period	64511.25		
24. Total Receipts This Period (line 16)	0.00	100000.00	0.00
25. Subtotal (23 + 24)	64511.25		
26. Total Disbursements This Period (line 22)	0.00	35488.75	0.00
27. Cash On Hand At Close Of The Reporting Period (25 - 26)	64511.25		

(End Detailed Summary Page, FEC FORM 3)

Generated Thu Oct 24 12:24:41 2024