



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**VIA Email**

sroberts@HoltzmanVogel.com

September 2, 2021

Steve Roberts  
Holtzman Vogel Baran Torchinsky Josefiak PLLC  
45 North Hill Drive, Suite 100  
Warrenton, VA 20186

RE: MURs 7438 & 7476  
Ohio First PAC

Dear Mr. Roberts:

On August 12, 2021, the Federal Election Commission accepted the signed conciliation agreement and \$15,000 civil penalty submitted on your client's behalf in settlement of a violation of 52 U.S.C. §§ 30101(a)(4)(A)(ii) and 30104(g). Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1628.

Sincerely,

A handwritten signature in black ink, appearing to read "NB", written over a light blue horizontal line.

Nicholas Bamman  
Attorney

Enclosure:  
Conciliation Agreement

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	MURs 7438 and 7476
Ohio First PAC and	)	
Julie Dozier in her official capacity	)	
as treasurer	)	

**CONCILIATION AGREEMENT**

These matters were initiated by a *sua sponte* submission made to the Federal Election Commission (“Commission”) by Ohio First PAC and Julie Dozier in her official capacity as treasurer and by two signed, sworn, and notarized complaints. The Commission found reason to believe that Ohio First PAC and Julie Dozier in her official capacity as treasurer (collectively, “Ohio First” or “Respondents”) violated 52 U.S.C. § 30104(a)(4)(A)(ii) by failing to timely file a pre-primary report and 52 U.S.C. § 30104(g) by failing to report its independent expenditures.

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Ohio First PAC is an independent expenditure-only political committee that registered with the Commission on January 21, 2018.

2. Julie Dozier is the treasurer of Ohio First PAC.
3. A political committee that makes or contracts to make independent expenditures aggregating \$10,000 or more for an election in any calendar year, up to and including the 20th day before an election, must report these expenditures within 48 hours (in “48-hour reports”). 52 U.S.C. § 30104(g)(2); 11 C.F.R. § 104.4(b)(2). These 48-hour reports must be filed by the end of the second day “following the date on which a communication that constitutes an independent expenditure is publicly distributed or otherwise publicly disseminated.” 11 C.F.R. § 104.4(b)(2).
4. A political committee that makes or contracts to make independent expenditures aggregating \$1,000 or more after the 20th day, but more than 24 hours, before the date of an election must report the expenditures within 24 hours (in “24-hour reports”). 52 U.S.C. § 30104(g)(1); 11 C.F.R. §§ 104.4(c), 109.10(d). These 24-hour reports must be filed before midnight on the day following the date on which the communication is publicly disseminated. 11 C.F.R. § 104.4(c).
5. In addition, political committees that make expenditures in connection with a primary election must file a pre-primary report no later than 12 days before that primary, disclosing all receipts and disbursements as of the 20th day before the primary election. 52 U.S.C. § 30104(a)(4)(A); 11 C.F.R. § 104.5(c)(1).
6. During April and May 2018, Ohio First made the following independent expenditures, totaling \$472,129.66:

<b>Distribution or Dissemination</b>	<b>Vendor</b>	<b>Amount</b>
Apr. 1, 2018	Majority Strategies	\$ 25,000.00
Apr. 1, 2018	Majority Strategies	\$ 93,270.00
Apr. 1, 2018	Majority Strategies	\$ 2,500.00

<b>Distribution or Dissemination</b>	<b>Vendor</b>	<b>Amount</b>
Apr. 2, 2018	Majority Strategies	\$ 52,307.33
Apr. 9, 2018	Majority Strategies	\$ 52,307.33
Apr.16, 2018	Majority Strategies	\$ 52,307.33
Apr. 16, 2018	Majority Strategies	\$ 25,000.00
Apr. 23, 2018	Majority Strategies	\$ 50,314.67
Apr. 30, 2018	Majority Strategies	\$ 51,311.00
May 1, 2018	Ascent Media LLC	\$ 7,700.00
May 1, 2018	Majority Strategies	\$ 58,362.00
May 1, 2018	Majority Strategies	\$ 1,750.00
	<b>Total:</b>	<b>\$ 472,129.66</b>

7. On June 29, 2018, Ohio First filed independent expenditure reports for the 12 expenditures it made from April 1 through May 1, 2018, and filed its Pre-Primary Report covering the period from April 1 through April 18, 2018.

8. Under the Commission's reporting schedule for the Ohio primary election, Ohio First was under an obligation to disclose the independent expenditures made on or before April 18, 2018, within 48 hours of the communications' public distribution or dissemination. Similarly, Ohio First was required to disclose the independent expenditures made between April 19 and May 6, 2018, within 24 hours of the communications' public distribution or dissemination. Ohio First was also required to file a Pre-Primary Report.

9. Ohio First voluntarily self-disclosed that it failed to timely file 24-Hour Reports disclosing \$169,437.67 in independent expenditures and 48-Hour Reports disclosing \$302,691.99 in independent expenditures. Ohio First also acknowledged that it did not file its Pre-Primary Report, an election-sensitive report, until more than six weeks after it was due.

V. Respondents violated 52 U.S.C. § 30104(a)(4)(A)(ii) by failing to timely file a pre-primary report and 52 U.S.C. § 30104(g) by failing to timely report its independent expenditures.

VI. Respondents will take the following actions:

1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of fifteen thousand dollars (\$15,000), pursuant to 52 U.S.C. § 30109(a)(5)(A).
2. Respondents will cease and desist from violating 52 U.S.C. § 30104(a)(4)(A)(ii) and 52 U.S.C. § 30104(g).

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

MURs 7438 and 7476 (Ohio First PAC)  
Conciliation Agreement  
Page 5 of 5

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lisa J. Stevenson  
Acting General Counsel

BY: Charles Kitcher  
Charles Kitcher  
Associate General Counsel  
for Enforcement

9/1/21  
Date

FOR THE RESPONDENTS:

\_\_\_\_\_  
Steve Roberts  
Counsel to Respondent

August 2, 2021  
Date