



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 1, 2022

By Email & UPS Signature Required

Louis G. Baglietto
4712 E. Second Street, #431
Long Beach, CA 90803
lbaglietto@yahoo.com

RE: MUR 7796

Dear Mr. Baglietto:

The Federal Election Commission (the “Commission”), the regulatory agency that administers and enforces the Federal Election Campaign Act of 1971, as amended (the “Act”), has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that you may have violated the Act or Commission regulations in your personal capacity by failing to file disclosure reports and maintain all required records as treasurer of Buzz Patterson for Congress. You were previously notified in your official capacity as treasurer in this matter, but now you are being notified in your personal capacity. You are therefore being provided this notice and an opportunity to respond, if you wish to do so.

We have obtained information indicating that since December 2019, as treasurer of Buzz Patterson for Congress, you have failed to file disclosure reports regarding approximately \$233,000 in receipts and \$233,000 in disbursements. Further, you have been unable to provide any invoices or receipts in response to requests from the Office of General Counsel. This Office is in possession of information indicating that you made over \$60,000 in disbursements to Buzz Patterson and other campaign staff/volunteers without requiring the submission of any invoices or receipts, but would rather electronically transfer money after receiving text messages requesting reimbursement of a specific amount. Text messages show that you were reminded by Buzz Patterson to file the disclosure reports at least 20 times but failed to do so. Over the phone you indicated to this Office that the failure to file disclosure reports was all your fault and that you take full responsibility.

Under the Act, each treasurer is required to keep an accurate account of and disclose, among other things, committee receipts, disbursements, and cash-on-hand balances.¹ Among other requirements, the treasurer shall file reports of receipts and disbursements that must specifically identify the cash-on-hand balance at the beginning of the reporting period, the total

¹ 52 U.S.C. §§ 30102(c), 30104(a), (b).

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amount of receipts, and the total amount of disbursements, including the name and address of each person to whom an expenditure exceeding \$200 is made, along with the date, amount, and purpose of the particular expenditure.² The treasurer is required to preserve all records and accounts for three years after the report to which such records and accounts relate is filed.³ The Commission has determined that it may deem a current or former treasurer to be party to an enforcement action in his or her personal capacity where the available information suggests that the treasurer “knowingly and willfully violated an obligation that the Act or regulations specifically impose on a treasurer or where a treasurer recklessly failed to fulfill duties imposed by law, or where the treasurer has intentionally deprived himself or herself of operative facts giving rise to the violation.”⁴

The Office of General Counsel is reviewing information to determine whether we should recommend to the Commission that it find there is reason to believe you violated the Act or Commission regulations in your personal capacity. A “reason to believe” finding is not a finding that any person violated the Act; rather, it means only that the Commission believes a violation may have occurred. In the event the Commission finds that there is reason to believe, it may authorize the Office of General Counsel to conduct an investigation to determine whether, in fact, a violation occurred or to assess the scope of the alleged violation. *See* 52 U.S.C. § 30109(a)(2). The Commission may also authorize the Office of General Counsel to enter into negotiations directed toward reaching a conciliation agreement in settlement of a matter at an earlier stage of the enforcement process prior to a Commission finding that there is probable cause believe that a person violated the Act or Commission regulations. *See* 11 C.F.R. § 111.18(d) and the enclosed procedures.

Before we make a recommendation to the Commission, we offer you the opportunity to provide in writing a response to the information in this letter. Should you choose to respond, you may also submit any materials — including documents or affidavits from persons with relevant knowledge — that you believe may be relevant or useful to the Commission’s consideration of this matter. The Commission will consider any additional information you provide in determining whether to find reason to believe that you violated the Act or Commission regulations.

Your response, if you choose to make one, must be submitted in writing within 15 days of this letter’s receipt. You should address any response to the Office of General Counsel, and

² 52 U.S.C. § 30104(b)(1), (2), (4), (5), (6)(B); 11 C.F.R. § 104.3(a), (b); 11 C.F.R. § 104.14.

³ 52 U.S.C. § 30102(c), (d); 11 C.F.R. § 102.9(c).

⁴ Statement of Policy Regarding Treasurers in Enforcement Proceedings, 70 Fed. Reg. 3, 4 (Jan. 3, 2005).

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the response should reference MUR 7796. Any correspondence sent to the Commission, such as a response, must be addressed to one of the following:

Mail

Federal Election Commission
 Office of Complaints Examination
 & Legal Administration
 Attn: Christal Dennis, Paralegal
 1050 First Street, NE
 Washington, DC 20463

OR

Email

cela@fec.gov

We strongly encourage you to file your response via email. If you submit your response via email, this Office will provide an electronic receipt by email. After 15 days, we will make our recommendations to the Commission. The Commission will then consider the recommendations and take appropriate action.

This matter will remain confidential unless you notify the Commission in writing that you wish the matter to be made public. *See* 52 U.S.C. § 30109(a)(4)(B), (a)(12). If you intend to be represented by counsel in this matter, please complete the enclosed form and return it to the Commission. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.⁵ Also, please be advised that you are required to preserve all documents, records, and materials relating to the subject matter in the complaint and discussed in this matter until we notify you that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519.

If you have any questions, please contact Richard Weiss, the attorney assigned to this Matter, at (202) 694-1021 or rweiss@fec.gov.

Sincerely,

Charles Kitcher

By: *RLW*

Charles Kitcher
 Associate General Counsel
 for Enforcement

⁵ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).