BEFORE THE FEDERAL ELECTION COMMISSION

In the Matters of

Citizens for a Working America; Joel Riter; Norman Cummings
Jobs and Progress Fund, Inc.; Vaughn Church; Thomas Norris; Mark Miller

MUR 7859
MUR 7860

SUPPLEMENTAL STATEMENT OF REASONS OF COMMISSIONER SEAN J. COOKSEY

In addition to the Statement of Reasons I joined in these matters with Vice Chair Dickerson and Commissioner Trainor, I have previously explained my views on the statute of limitations and equitable remedies in a Supplemental Statement of Reasons in MURs 6917 & 6929 (Scott Walker, et al.) and MURs 6955 & 6983 (John R. Kasich, et al.).

As detailed in that statement, I believe that mandating retrospective reporting and disclosure is a penalty subject to 18 U.S.C. § 2462’s limitations period, and that even if mandatory disclosure were not a penalty, any reporting requirement would still be barred under the concurrent-remedies doctrine. I applied the same reasoning to these matters and accordingly voted to dismiss pursuant to the expiration of the statute of limitations.

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December 17, 2021

Sean J. Cooksey
Commissioner

1 Statement of Reasons of Vice Chair Dickerson and Commissioners Cooksey and Trainor (Dec. 17, 2021), MUR 7859 (Citizens for a Working America, et al.) and MUR 7860 (Jobs and Progress Fund, Inc., et al.).
