



THE FEDERAL ELECTION COMMISSION
Washington, DC 20463

February 17, 2022

Via Electronic Mail

Jonathan Berkon
Emily Hogin
Elias Law Group
10 G Street NE, Suite 600
Washington, DC 20002
jberkon@elias.law
ehogin@elias.law

RE: MUR 7948 (Grassroots Victory PAC)

Dear Mr. Berkon and Ms. Hogin:

On February 14, 2022, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of your client, Grassroots Victory PAC and Heather Kashner in her official capacity as treasurer, in settlement of a violation of 52 U.S.C. § 30104(b) of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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) 294-3097.

Sincerely,

Christopher S. Curran

Christopher S. Curran
Attorney

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of)	
)	MUR 7948
Grassroots Victory PAC and)	
Heather Kashner in her official)	
capacity as treasurer)	
)	

CONCILIATION AGREEMENT

This matter was initiated pursuant to information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Grassroots Victory PAC and Heather Kashner in her official capacity as treasurer ("Respondent" or "Committee") violated 52 U.S.C. § 30104(b).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. The Committee is a nonconnected political action committee that registered with the Commission on February 8, 2016. Heather Kashner is the current treasurer of the Committee.

2. The Federal Election Campaign Act of 1971, as amended (the “Act”), requires committee treasurers to file reports of receipts and disbursements in accordance with the provisions of 52 U.S.C. § 30104. 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a). These reports must include, *inter alia*, the total amount of receipts and disbursements, including the appropriate itemizations, where required. 52 U.S.C. § 30104(b); 11 C.F.R. § 104.3(a).

3. The Committee disclosed combined total disbursements of \$386,210 on its original Monthly Reports covering the 2017-2018 election cycle.

4. In January and August 2018, prior to the commencement of the Commission’s audit, the Committee voluntarily corrected its disclosed disbursements. The Committee’s combined increase and decrease of disbursement activity in its 2017-2018 election cycle reports totaled \$141,843.29. The Committee’s amended reports accurately reflect the amount of disbursements covering the 2017-2018 election cycle.

V. Respondent violated 52 U.S.C. § 30104(b) by failing to accurately report disbursements on its original reports.

VI. Respondent will take the following actions:

1. Respondent will pay a civil penalty to the Commission in the amount of Seven Thousand Dollars (\$7,000), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Respondent will cease and desist from committing violations of 52 U.S.C. § 30104(b).

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 the same and the Commission has approved the entire agreement.

IX. Respondent 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.

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 within this written agreement shall be enforceable.

FOR THE COMMISSION:

Lisa J. Stevenson
 Acting General Counsel

BY: Charles
 Kitcher

Digitally signed by
 Charles Kitcher
 Date: 2022.02.17
 13:58:40 -05'00'

Charles Kitcher
 Associate General Counsel
 for Enforcement

 Date

FOR THE RESPONDENT:

DocuSigned by:
 Heather Kashner
 B9229712FC1B41B...
 (Name) Heather Kashner
 (Position) Treasurer

1/24/2022

 Date