



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 23, 2022

By: Electronic Mail

Chris Ashby
Ashby Law
625 North Washington Street, Suite 325
Alexandria, Virginia 22314
Chris@ashby.law

RE: MUR 7958
Steven C. Watkins Sr.

Dear Mr. Ashby:

On March 16, 2022, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of Steven C. Watkins Sr. in settlement of violations of 52 U.S.C. §§ 30116(a), 30122 and 11 C.F.R. § 110.4(b)(1)(i), provisions of the Federal Election Campaign Act of 1971, as amended (the “Act”) and Commission regulations. The Commission also voted to close the file.

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. If you have any questions, please contact me at (202) 746-8546.

Sincerely,

Kimberly D. Hart
Kimberly D. Hart
Attorney

Enclosure: Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Steven C. Watkins Sr.) MUR 7958

CONCILIATION AGREEMENT

9 This matter was initiated by a *sua sponte* submission (“the Submission”) made to the
10 Federal Election Commission (the “Commission”) by Steven C. Watkins Sr. *See* 52 U.S.C.
11 § 30109(a)(1). The Commission found reason to believe that Steven C. Watkins Sr. violated
12 52 U.S.C. §§ 30116(a), 30122 and 11 C.F.R. § 110.4(b)(1)(i)), provisions of the Federal Election
13 Campaign Act (the “Act”) and Commission regulations, by making excessive contributions in
14 the name of others.

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

18 I. The Commission has jurisdiction over the Respondent and the subject matter of
19 this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C.
20 § 30109(a)(4)(A)(i).

21 II. Respondent has had a reasonable opportunity to demonstrate that no action should
22 be taken in this matter.

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

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

25 1. On November 7, 2017, Steve Watkins, Jr. (“the Candidate”) filed a Statement of
26 Candidacy to run for the House of Representatives in Second Congressional District of Kansas

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1 and designated the Committee to Elect Steve Watkins and Steven G. Martin in his official
2 capacity as treasurer (“the Committee”) as his principal campaign committee.

3 2. Steven C. Watkins Sr. (“Watkins Sr.”), the Candidate’s father, a Topeka, Kansas
4 area physician, and his wife, Barbara Watkins, each made the maximum allowable primary and
5 general election contributions to the Committee on December 7, 2017, and May 29, 2018.

6 3. Caroline Wise and Diane Watkins are the daughters of Watkins Sr., and the sisters
7 of Steve Watkins, Jr. Andrew Wise is Caroline Wise’s husband, and Benjamin Knopke is Diane
8 Watkins’s boyfriend.

9 4. On May 29, 2018, Watkins Sr. and his wife, Barbara Watkins both made \$2,700
10 general election contributions. Watkins Sr. then suggested that the daughters and their
11 significant others, who already had made \$2,700 primary election contributions, make additional
12 \$2,700 general election contributions and agreed to provide funds for this purpose.

13 5. On or about February 16, 2018, Watkins Sr. gave four \$2,700 checks (total
14 \$10,800) to his daughters and their significant others. On or about February 21, 2018, and
15 March 19, 2018, respectively, Diane Watkins and Benjamin Knopke used the money Watkins Sr.
16 provided to make \$2,700 general election contributions to the Committee. In March 2018,
17 Caroline Wise used the funds her father provided to make general election contributions on
18 behalf of herself and Andrew Wise which were not received by the Committee until late May or
19 early June 2018.

20 6. On June 10, 2018, Watkins Sr. became aware that it was illegal to reimburse
21 contributions. The Candidate, Watkins Jr., after being informed of the actions of Watkins Sr.,
22 instructed the Committee to refund contributions to Diane Watkins and Benjamin Knopke. In

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1 addition, the Committee returned the un-deposited general election contribution checks from the
2 Wises totaling \$5,400.

3 7. The Act and Commission regulations prohibit any person, including a corporation
4 from making of a contribution in the name of another to a federal political committee. 52 U.S.C.
5 § 30122; 11 C.F.R. § 110.4(b)(1)(i).

6 8. Under the Act, an individual may not make a contribution to a candidate with
7 respect to any election in excess of the legal limit, which was \$2,700 per election during the
8 2017-2018 election cycle. *See* 52 U.S.C. § 30116(a)(1)(A); 11 C.F.R. § 110.1(b)(1).

9 V. Respondent violated 52 U.S.C. §§ 30116(a) and 30122; and 11 C.F.R.
10 § 110.4(b)(1)(i) by making excessive contributions in the names of others.

11 VI. Respondent will take the following actions:

12 1. Respondent will cease and desist from violations of 52 U.S.C. §§ 30116(a),
13 30122; and 11 C.F.R. § 110.4(b)(1)(i).

14 2. Respondent will pay a civil penalty of Four Thousand Dollars (\$4,000), pursuant
15 to 52 U.S.C. § 30109(a)(5)(A).

16 VII. The Commission, on request of anyone filing a complaint under 52 U.S.C.
17 § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review
18 compliance with this agreement. If the Commission believes that this agreement or any
19 requirement thereof has been violated, it may institute a civil action for relief in the United States
20 District Court for the District of Columbia.

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

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1 IX. Except as otherwise provided, Respondents shall have no more than 30 days from
2 the date this agreement becomes effective to comply with and implement the requirements
3 contained in this agreement and to so notify the Commission.

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

8 FOR THE COMMISSION:

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11 Lisa J. Stevenson
12 Acting General Counsel
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14 BY: Charles
15 Kitcher


Digitally signed by
Charles Kitcher
Date: 2022.03.23 09:51:29
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15 Charles Kitcher
16 Acting Associate General Counsel
17 for Enforcement

3/23/22

Date

18 FOR THE RESPONDENT:

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20
21 
22 Chris Ashby
 Counsel for Respondent

March 4, 2022

Date