



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

**VIA ELECTRONIC MAIL AND
UPS SIGNATURE REQUESTED**

Terrance Whitehead

[REDACTED]

Chicago, IL 60651

[REDACTED]

April 10, 2025

RE: MUR 7996
Pat Dowell for Congress, *et al.*

Dear Mr. Whitehead:

This is in reference to the complaint you filed with the Federal Election Commission on May 6, 2024, concerning Patricial R. Dowell, Pat Dowell for Congress and Mattie Lacy in her official capacity as treasurer (the "Federal Committee"), and Citizens for Pat Dowell (the "State Committee"). The Commission found that there was reason to believe that Patricia Dowell, the Federal Committee, and the State Committee violated 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. §§ 110.3(d) and 300.61; and, the Federal Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a)-(b), provisions of the Federal Election Campaign Act of 1971, as amended, and Commission regulations, and instituted an investigation of this matter. On March 11, 2025, a conciliation agreement signed by Patricia Dowell was accepted by the Commission. Accordingly, the Commission voted to close the file in this matter effective today.

Documents related to the case will be placed on the public record today. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Copies of the agreement and Factual and Legal Analysis are enclosed for your information.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Dominique Dillenseger

Dominique Dillenseger
Attorney

1 **FEDERAL ELECTION COMMISSION**

2 **FACTUAL AND LEGAL ANALYSIS**

3 **RESPONDENTS:** Pat Dowell for Congress and Mattie Lacy **MUR: 7996**
4 in her official capacity as treasurer
5 Citizens for Pat Dowell
6 Patricia Dowell
7

8 **I. INTRODUCTION**

9 The Complaint alleges that Patricia Dowell, a candidate for Illinois's First Congressional
10 District in the 2022 primary election and former Illinois state candidate, used nonfederal funds
11 from her state committee, Citizens for Pat Dowell (the "State Committee"), to pay the expenses
12 of her federal committee, Pat Dowell for Congress and Mattie Lacy in her official capacity as
13 treasurer (the "Federal Committee"), in violation of the Federal Election Campaign Act of 1971,
14 as amended (the "Act"). Dowell denies the allegations, asserting that her committees' shared
15 accountant inadvertently reported some of the Federal Committee's disbursements on the State
16 Committee's disclosure report, and that the State Committee filed an amended disclosure report
17 correcting the errors.

18 The State Committee's amended report, however, still discloses expenses that appear to
19 be related to the Federal Committee. Even after amending the report to fix the apparent error by
20 the shared accountant, the State Committee reported \$281,539.60 in disbursements after Dowell
21 suspended her state campaign and after she declared her federal candidacy. It appears that
22 \$15,532.07 of those disbursements were made on behalf of the Federal Committee including:
23 (1) disbursements to the shared accountant while the Federal committee did not make any such
24 payments; (2) disbursements for rent while the Federal Committee did not make any such
25 payments during the same period; ; and (3) disbursements for election day workers for an
26 election in which Dowell was only a candidate in a federal race and not a state race. The

1 \$15,532.07 in disbursements were made with federally impermissible funds and were not subject
2 to the Act's reporting provisions.

3 Additionally, the Federal Committee appears to have failed to disclose certain
4 disbursements. Based on the explanation proffered in the Response, any transaction that was
5 disclosed on the original State Committee 2022 April Quarterly Report and not disclosed on the
6 amended report was a Federal Committee disbursement. However, there are \$20,628.87 in
7 disbursements that were disclosed on the original State Committee report but not on the amended
8 report and not disclosed on the Federal Committee's disclosure reports covering the same period.

9 Therefore, the Commission finds reason to believe that Dowell, the State Committee, and
10 the Federal Committee violated 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. §§ 110.3(d) and
11 300.61 by spending and receiving funds in connection with a federal election not subject to the
12 limitations, prohibitions and reporting requirements of the Act. The Commission further finds
13 reason to believe that the Federal Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R.
14 § 104.3(a) and (b) by failing to report in-kind contributions and disbursements.

15 II. FACTUAL BACKGROUND

16 Patricia Dowell is a Chicago Alderman of the 3rd Ward,¹ and a former candidate for
17 Illinois Secretary of State and for Congress from Illinois's First Congressional District.² On
18 April 7, 2021, Dowell announced her campaign for Illinois Secretary of State and subsequently
19 formed a State campaign committee for that race — Citizens for Pat Dowell.³ On January 5,
20 2022, Dowell announced she was suspending her campaign for Illinois Secretary of State and

¹ *Alderman Dowell's Biography*, CITY OF CHICAGO, www.chicago.gov/city/en/about/wards/03/alderman_dowell_sbiography.html (last visited Dec. 9, 2022).

² Resp. at 1 (June 3, 2022).

³ *Id.*

1 instead was running for U.S. Congress.⁴ Pat Dowell for Congress is Dowell’s principal
 2 campaign committee and Mattie Lacy is the treasurer.⁵ Dowell lost the June 28, 2022,
 3 congressional primary election.⁶

4 The Complaint alleges that the State Committee disclosed a significant number of
 5 disbursements on its 2022 April Quarterly Report that appear to have been for the federal
 6 election, such as rent, advertising, salaries and other expenses “purchased well after [Dowell]
 7 suspended her [Secretary of State] campaign and launched a federal campaign.”⁷ The Complaint
 8 lists over 120 of these disbursements totaling \$169,024.06.⁸ The Complaint states that the
 9 Federal Committee’s 2022 April Quarterly Report “shows few or no similar expenses,
 10 continuing to reinforce” the allegation that the State Committee made disbursements for
 11 Dowell’s congressional campaign.⁹

12 Dowell filed a response denying that she “use[d] nonfederal political funds to pay for
 13 routine campaign expenditures for [her] Congressional campaign through March 31, 2022.”¹⁰
 14 Dowell included a signed affidavit from DeAnna Grant, the accountant employed by both the
 15 Federal and State Committees, stating that when she filed the State Committee’s 2022 April
 16 Quarterly Report on April 13, 2022, she “inadvertently filed bank activity for Pat Dowell for

⁴ *Id.*; Patricia Dowell, Statement of Candidacy (Jan. 6, 2022).

⁵ Pat Dowell for Congress, Statement of Organization (Jan. 6, 2022).

⁶ *2022 General Primary Election Results*, ILLINOIS STATE BOARD OF ELECTIONS,
<https://elections.il.gov/ElectionOperations/ElectionVoteTotals.aspx?T=637980584556772869> (last visited
 Dec. 9, 2022).

⁷ Compl. at 1-2.

⁸ *Id.* at 2-7.

⁹ Compl. at 7.

¹⁰ Resp. at 1. The Response appears to be from Dowell individually, as it states, “I announced my campaign,” “I announced that I was suspending my race,” and so forth. *Id.* The Response is also signed by “Mattie Lacy[,] Treasurer.” *Id.* at 2. Lacy is the treasurer of the Federal Committee. Neither the State Committee nor the Federal Committee filed a response.

Congress.”¹¹ Grant further states that the error was brought to her attention two days after she filed the State Committee report and that “[t]he matter was corrected immediately on that same day.”¹² Grant filed the amended report on April 15, 2022, and the Complaint was filed three weeks later on May 6, 2022.

Even after the State Committee amended its April Quarterly Report to apparently fix the misreporting of Federal Committee expenditures on the State Committee report, the amended state report still discloses disbursements that appear to be for the benefit of the Federal Committee as alleged in the Complaint.¹³ After the April Quarterly Report coverage period ending on March 31, 2022, the State Committee continued to make disbursements to the same vendors whose work is alleged in the Complaint to be for the benefit of the Federal Committee, for accounting services and rent.¹⁴ The State Committee’s July Quarterly Report disclosed disbursements for accounting services to Grant Financial Services, the firm of DeAnna Grant, and for rent to Matanky Realty Group; the Federal Committee did not disclose any payments for either purpose or to either vendor.¹⁵ The State Committee also made disbursements for 66 election day workers on June 28, 2022 — the date of the Congressional primary election in Illinois, on which Dowell was only a candidate for the Congressional seat, as she had withdrawn

¹¹ *Id.*, DeAnna Grant Aff. ¶ 5. Although styled as an affidavit, it is not sworn to. Grant’s signature appears underneath the affidavit next to the signatures of Dowell and Lacy.

¹² *Id.*, DeAnna Grant Aff. ¶ 6.

¹³ The State Committee Amended 2022 April Quarterly Report disclosed a total of \$281,539.60 in disbursements, \$194,575 of which were refunds to State Committee contributors. Therefore, the State Committee otherwise spent \$86,964.60 while the Federal Committee spent \$84,408.64 during the same three-month period.

¹⁴ *See* Citizens for Pat Dowell, D-2 Quarterly Report at 4, 9, 11, 15, 17, ILLINOIS STATE BOARD OF ELECTIONS (July 15, 2022), <https://www.elections.il.gov/CampaignDisclosure/ItemizedExpenditures.aspx?FiledDocID=ATycWRNKUO%2bwuPbw5wXI%2fA%3d%3d&ExpenditureType=7PO3RGHF2W%2fsyStv1naW9vd6PLmRT8u2mEDnPt%2bcsAk%3d&T=637974612790435357> (“State Committee July Quarterly Report”).

¹⁵ State Committee July Quarterly Report at 11, 15.

1 from the Secretary of State race.¹⁶ In addition, the State Committee disclosed \$20,628.87 in
2 disbursements on its original 2022 April Quarterly Report but not on the amended report,
3 presumably, according to Dowell's Response, because they were in fact misreported
4 disbursements made by the Federal Committee. However, as enumerated in the chart below,
5 these \$20,628.87 in disbursements were never disclosed by the Federal Committee.

6

¹⁶ *Id.* at 4-25. The next election for the Alderman office is in February 2023. *Quick Reference Guide 2023 Municipal, Alderperson & District Council Elections*, CHICAGO BOARD OF ELECTION COMMISSIONERS, <https://app.chicagoelections.com/Documents/general/M2023%20Quick%20Reference%20Guide.pdf> (last visited Dec. 9, 2022).

Vendor	Date	Purpose	Amount
CABC	3/10/22	Donation – year	\$4,000.00
Catering by David	3/31/22	Food	\$1,295.00
Democratic Party of Illinois	2/26/22	Computer-software	\$2,000.00
Dunkin Donuts	2/14/22	Food	\$44.39
Dunkin Donuts	3/28/22	Food	\$62.10
Dunkin Donuts	3/15/22	food	\$165.91
Dyer, Major Clear Sandra	3/28/22	Cleaning	\$750.00
EF Design Group	2/16/22	Printing	\$3,425.00
Equality IL Institute	2/03/22	Donation	\$1,000.00
Sharon Jones	3/02/22	Pastoral outreach services	\$1,000.00
L2 Lounge	2/16/22	Meals	\$5,960.78
Pearl's Place	3/03/22	Food	\$212.40
Petterinos	3/25/22	Food	\$186.44 ¹⁷
QR Code	Multiple	QR barcode generator	\$197.65 ¹⁸
Target	3/30/22	Office supplies	\$97.88 ¹⁹
Uber	Multiple	Transportation	\$713.29
Total Not Reported on Federal Committee Reports			\$20,628.87

III. LEGAL ANALYSIS

A. The Commission Finds Reason to Believe that Respondents Violated the Soft Money Prohibitions

The Act places certain amount limitations and source prohibitions on contributions to federal candidates and their committees.²⁰ The Act prohibits federal candidates, federal officeholders, their agents, and entities established, financed, maintained, or controlled

¹⁷ Because this disbursement is under \$200, the Federal Committee did not need to itemize it and it is not included in the \$20,628.87. 52 U.S.C. § 30104(b)(5)(A).

¹⁸ Because this disbursement is under \$200, the Federal Committee did not need to itemize it and it is not included in the \$20,628.87. 52 U.S.C. § 30104(b)(5)(A).

¹⁹ The Federal Committee made more than \$200 in disbursements to Target in the aggregate so it should have been itemized. See *FEC Filtered Results*, FEC.gov https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00799650&recipient_name=target (showing disbursements to Target) (last visited Dec. 9, 2022); 52 U.S.C. § 30104(b)(5)(A).

²⁰ See 52 U.S.C. §§ 30116(a) (contribution limits), 30118(a) (prohibition on corporate and labor organization contributions to candidates).

(“EFMC’d”) by federal candidates²¹ from soliciting, receiving, directing, transferring, spending, or disbursing funds in connection with a federal election unless the funds are subject to the limitations, prohibitions, and reporting requirements of the Act.²² Federal candidates are prohibited from transferring funds from their state campaign committees to their federal committees.²³ The Commission has explained that this prohibition is intended to prevent a federal committee’s indirect use of impermissible funds in federal elections.²⁴ The prohibition on transferring funds includes payment by the state committee for services to the federal committee.²⁵

1. The State Committee Appears to Have Paid Expenses of the Federal Committee

a. Grant Financial Services

The State Committee’s amended reports show \$9,102.13 in disbursements to Grant Financial Services, the firm of DeAnna Grant, accountant for both the State and Federal Committees,²⁶ during the first six months of 2022.²⁷ In her affidavit, Grant states that she was employed by the Federal Committee beginning in January 2022 and does not claim to have worked as a volunteer.²⁸ Yet the Federal Committee did not report any disbursements to Grant

²¹ The Commission has concluded that a federal candidate’s state committee is an entity EFMC’d by the federal candidate. Advisory Opinion 2007-26 at 4 (Schock); Advisory Opinion 2006-38 at 4 (Casey State Committee).

²² 52 U.S.C. § 30125(e)(1)(A).

²³ 11 C.F.R. § 110.3(d).

²⁴ Explanation and Justification, Transfers of Funds from State to Federal Campaigns, 58 Fed. Reg. 3474, 3475 (Jan. 8, 1993).

²⁵ *See id.* at 3475.

²⁶ *See Resp.* at 2, DeAnna Grant Aff. ¶¶ 2-4.

²⁷ *See* State Committee 2022 July Quarterly Report at 11; State Committee Amended 2022 April Quarterly Report at 15.

²⁸ *Resp.*, DeAnna Grant Aff. ¶ 3.

Financial Services. Therefore, it appears that a portion of the State Committee’s disbursements—a reasonable estimate is one-half of these disbursements, or \$4,551.07—was to the benefit of the Federal Committee.²⁹

b. Rent Payments

The State Committee’s amended reports show \$7,983 in disbursements for rent to the Matanky Realty Group from November 2021 through June 2022.³⁰ The monthly payments appear to be \$887 per month.³¹ According to their filings, the State Committee and the Federal Committee share the same mailing address,³² suggesting that the two committees made use of the same space. But the Federal Committee did not disclose any rent payments for a campaign office or headquarters. Therefore, it appears that the State Committee paid \$887 per month in rent on behalf of both committees from February to June for a total of \$5,322, and a portion—a reasonable estimate is one-half of these disbursements, or \$2,661—was to the benefit of the Federal Committee.

c. Election Day Workers

The State Committee disclosed payments to 66 election day workers on June 28, 2022—the day of the Congressional primary election.³³ Each of the workers was paid either \$160 or

²⁹ *FEC Filtered Results*, FEC.gov, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00799650&recipient_name=grant&recipient_name=grants (last visited Dec. 9, 2022) (showing no disbursements to Grant’s Financial Services).

³⁰ State Committee 2022 July Quarterly Report at 15 and State Committee Amended 2022 April Quarterly Report at 21.

³¹ This number was determined by dividing the total payments by the number of months the purpose descriptor identified the payments were for. *Id.*

³² *Compare* Amended Statement of Organization, Pat Dowell for Congress (Jan. 21, 2022), *with* Committee Details, Citizens for Pat Dowell, *available at* <https://www.elections.il.gov/campaigndisclosure/CommitteeDetail.aspx?ID=9YWggXnTa05vzj1XbMuCSg%3d%3d> (last visited June 9, 2023).

³³ *See* State Committee 2022 July Quarterly Report at 4-25.

\$225.³⁴ The Federal Committee also paid six people either \$160 or \$225 on June 28, 2022 for “field.”³⁵ Since Dowell was only on the ballot for the federal election and her Alderman seat is not up for reelection until 2023, any election day workers working for her would have been for her Congressional race. Therefore, the \$8,320 the State Committee paid towards election workers appears to have been to the benefit of the Federal Committee.

d. Summary of State Committee Payments of Federal Committee Expense

Vendor	Amount
Grant Financial Services	\$4,551.07
Matanky Realty Group	\$2,661.00
Election Day Workers	\$8,320.00
	Total: \$15,532.07

2. State Committee Payments Well After Dowell Discontinued her Secretary of State Campaign Cannot be Explained by Repaying Debts Incurred During That Campaign

The State Committee did not report any outstanding debts or obligations on any of its three quarterly reports covering October 2021 through June 2022. Therefore, the timing of the State Committee payments well after Dowell discontinued her Secretary of State campaign cannot be explained by repaying debts incurred during that campaign. Due to the timing and the lack of any disclosed debt, it is reasonable to conclude that all of the disbursements made by the

³⁴ *Id.*

³⁵ *FEC Filtered Results*, FEC.gov, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00799650&disbursement_description=field (last visited Dec. 9, 2022) (showing disbursements on June 28 for \$160 and \$225).

State Committee discussed above, totaling \$15,532.07.07, were made for expenses incurred during or shortly before each respective reporting period.³⁶

3. The State Committee's Payments Appear to Violate the Soft Money Prohibition

As a matter of law, the State Committee was EFMC'd by Dowell.³⁷ Here, the State Committee received contributions permissible under Illinois law³⁸ that are either in excess of the Act's limitations or from prohibited sources and thus these funds are not federally permissible.³⁹ Between July 1, 2021, and June 30, 2022, the State Committee received \$130,251 in corporate contributions.⁴⁰ Nor are the State Committee funds subject to the Act's reporting requirements.⁴¹ Therefore, any disbursements made by the State Committee for expenses of the Federal Committee are impermissible under the Act's provision requiring that only funds raised under the limits, prohibitions, and reporting requirements of the Act be used in federal elections.

Based on the available information, the \$15,532.07 in State Committee disbursements described above appear to be made for expenses incurred by the Federal Committee and were made with federally impermissible funds not subject to the Act's reporting provisions. Therefore,

³⁶ See Citizens for Dowell Quarterly Report covering October 1 - December 31, 2021, ILLINOIS STATE BOARD OF ELECTIONS, <https://www.elections.il.gov/CampaignDisclosure/D2Quarterly.aspx?id=UxuhifCsFwHv8iQDmRRsyw%3d%3d&T=637975499985716480> (Jan. 13, 2022) (showing no outstanding debts), State Committee Amended 2022 April Quarterly Report (showing no outstanding debts); State Committee 2022 July Quarterly Report (showing no outstanding debts).

³⁷ See *supra* note 21.

³⁸ *Contributions Per Election Cycle*, STATE BOARD OF ELECTIONS, STATE OF ILLINOIS, <https://www.elections.il.gov/downloads/campaigndisclosure/pdf/contributionssummary.pdf> (Jan. 1, 2021) (permitting contributions from corporations, labor organizations, and associations and permitting contributions of \$6,000 from individuals).

³⁹ See 52 U.S.C. § 30125(e)(1)(A); accord 11 C.F.R. §§ 110.3(d), 300.61.

⁴⁰ See Citizens for Dowell Quarterly Reports from July 1, 2021 – June 30, 2022, ILLINOIS STATE BOARD OF ELECTIONS, <https://www.elections.il.gov/CampaignDisclosure/CommitteeDetail.aspx?ID=9YWggXnTa05vzj1XbMuCSg%3d%3d&T=637975365653449299>.

⁴¹ 52 U.S.C. § 30125(e)(1)(A); accord 11 C.F.R. § 300.61.

the Commission finds that Dowell, the State Committee, and the Federal Committee violated 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. §§ 110.3(d) and 300.61.

B. The Commission Finds Reason To Believe the Federal Committee Violated Reporting Provisions

The treasurer of a political committee is required to file reports of receipts and disbursements.⁴² Among other requirements, the reports of receipts and disbursements must specifically identify the cash-on-hand balance at the beginning of the reporting period, the total 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.⁴³

1. The Federal Committee Appears to Have Failed to Disclose In-Kind Contributions

The Federal Committee appears to have failed to report the in-kind contributions for the federal expenses incurred by the State Committee summarized above. Therefore, the Commission finds reason to believe that the Federal Committee failed to report \$15,532.07 of in-kind contributions from the State Committee in violation of 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a).

2. The Federal Committee Appears to Have Failed to Report Certain Expenditures

The Response states that the Committees' accountant mistakenly reported the Federal Committee's disbursements on the State Committee's 2022 April Quarterly Report and then filed

⁴² 52 U.S.C. § 30104(a), (b); 11 C.F.R. § 104.3(a), (b).

⁴³ 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.

an amended corrective state report.⁴⁴ It appears, then, that any transaction that was disclosed on the original report and not reported on the amended state report would be a federal disbursement. However, there are \$20,628.87⁴⁵ in disbursements that were disclosed on the original State Committee report but not on the amended report and not disclosed on the Federal Committee's disclosure reports as identified on the table above in part II.⁴⁶

Therefore, the Commission finds reason to believe that the Federal Committee failed to report \$20,628.87 in disbursements on disclosure reports with the Commission in violation of 52 U.S.C. § 30104(b) and 11 C.F.R § 104.3(b).

⁴⁴ Resp. at 2.

⁴⁵ The \$20,628.87 figure was derived using the table above minus the two disbursements under \$200 that did not require itemization. *See supra* at page 6 and notes 17 and 18.

⁴⁶ *Compare* State Committee Amended April Report with Citizens for Pat Dowell, Original D-2 Quarterly Report, ILLINOIS STATE BOARD OF ELECTIONS (Apr. 13, 2022), <https://www.elections.il.gov/CampaignDisclosure/ItemizedExpenditures.aspx?FiledDocID=CmqIw%2fY75EdhYv3GaO9Q8Q%3d%3d&ExpenditureType=7PO3RGHF2W%2fsyStv1naW9vd6PLmRT8u2mEDnPt%2bcsAk%3d&T=637974631043427615> with FEC Filtered Results, FEC.gov, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00799650 (last visited Dec. 9, 2022) (showing no disbursements around the dates the original State Committee disclosure report used for disbursements to CABC, Catering by David, Democratic Party of Illinois, Dunkin Donuts, Dyer Major Clear Sandra, Ef Design Group, Equality IL, Sharon Jones, L2 Lounge, Pearl's Place, Sandra Dyer, Target and Uber.)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Patricia Dowell)	MUR 7996
Pat Dowell for Congress and)	
Mattie Lacy in her official)	
capacity as treasurer)	
Citizens for Pat Dowell)	
)	

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint. The Commission found reason to believe that Patricia Dowell, Pat Dowell for Congress and Mattie Lacy in her official capacity as treasurer (the “Federal Committee”), and Citizens for Pat Dowell (the “State Committee”) (collectively, “Respondents”) violated 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. §§ 110.3(d) and 300.61 by spending and receiving funds in connection with a federal election not subject to the limitations, prohibitions, and reporting requirements of the Federal Election Campaign Act of 1971, as amended (the “Act”). The Commission also found reason to believe that the Federal Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a) by failing to report in-kind contributions and 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) by failing to report disbursements.

NOW, THEREFORE, the Commission and 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 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 and law in this matter are as follows:

1. Patricia Dowell is a former candidate for Illinois Secretary of State and for Congress from Illinois's First Congressional District. Dowell is Alderman of the 3rd Ward in Chicago, Illinois.

2. Citizens for Pat Dowell is Dowell's state campaign committee for Dowell's Illinois Secretary of State campaign.

3. On January 5, 2022, Dowell announced she was suspending her campaign for Illinois Secretary of State and instead was running for U.S. Congress.

4. Pat Dowell for Congress is Dowell's principal campaign committee and Mattie Lacy is the treasurer.

5. The Act prohibits federal candidates, federal officeholders, their agents, and entities established, financed, maintained, or controlled ("EFMC'd") by federal candidates from soliciting, receiving, directing, transferring, spending, or disbursing funds in connection with a federal election unless the funds are subject to the limitations, prohibitions, and reporting requirements of the Act. 52 U.S.C. § 30125(e)(1)(A). Federal candidates are prohibited from transferring funds from their state campaign committees to their federal committees. 11 C.F.R. § 110.3(d). The prohibition on transferring funds applies broadly and includes payment by the state committee for services to the federal committee. Explanation and Justification, Transfers of Funds from State to Federal Campaigns, 58 Fed. Reg. 3474, 3475 (Jan. 8, 1993).

6. The Act requires committee treasurers to file reports of receipts and disbursements. 52 U.S.C. § 30104(a)(1); *accord* 11 C.F.R. § 104.1(a). Political committees are required to report the name and address of each person who makes a contribution aggregating more than \$200 per calendar year, or per election cycle for authorized committees, as well as the date, amount, and purpose of such payments. 52 U.S.C. § 30104(b)(3)(A); 11 C.F.R. § 104.3(a)(4).

7. The State Committee received contributions permissible under Illinois law that are either in excess of the Act's limitations or from prohibited sources and thus these funds are not federally permissible. Between July 1, 2021, and June 30, 2022, the State Committee received \$130,251 in corporate contributions. Nor are the State Committee funds subject to the Act's reporting requirements. Therefore, any disbursements made by the State Committee for expenses of the Federal Committee are impermissible under the Act's provision requiring that only funds raised under the limits, prohibitions, and reporting requirements of the Act be used in federal elections.

8. Subsequent to the reason-to-believe findings, Dowell provided a sworn declaration to the Commission detailing specific disbursements from the State Committee's account described as related to her elected position as Alderman and unrelated to her 2022 campaign for Congress. Based on that information, the Commission reduced the amount the State Committee made in unreported disbursements from \$20,628.87 to \$7,886.46 and in unreported in-kind contributions from \$15,532.07 to \$7,212.07 on behalf of the Federal Committee.

9. The State Committee made \$7,212.07 in disbursements on behalf of the Federal Committee for a shared accountant and for rent. The disbursements were made with federally impermissible funds and were not subject to the Act's reporting provisions.

10. The Federal Committee failed to disclose the \$7,212.07 in disbursements made by the State Committee on its behalf as in-kind contributions from the State Committee.

11. The shared accountant inadvertently filed bank activity for the Federal Committee on the State Committee's 2022 April Quarterly Report. The State Committee amended its report to remove federal disbursements. The Federal Committee disclosed most of these federal disbursements but failed to disclose \$7,886.47 in itemized disbursements.

V. Respondents committed the following violations:

1. Respondents violated 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. §§ 110.3(d) and 300.61 by spending and receiving State Committee funds not subject to the limitations, prohibitions and reporting requirements of the Act in connection with a federal election.

2. The Federal Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a) by failing to report in-kind contributions.

3. The Federal Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) by failing to report disbursements.

VI. Respondents will take the following actions:

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

2. Respondents will cease and desist from violating 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. §§ 110.3(d) and 300.61. The Federal Committee will also cease and desist from violating 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a) and (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 same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (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 in this written Agreement shall be enforceable.

FOR THE COMMISSION:

BY: **Lisa Jane Stevenson**
 Lisa Stevenson
 Acting General Counsel

Digitally signed by Lisa Jane Stevenson
 Date: 2025.04.01 14:53:15 -04'00'

 Date

FOR THE RESPONDENTS:

 Pat Dowell
 (name)
 (position)

 2/16/2025
 Date