



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

VIA ELECTRONIC MAIL

Patricia R. Dowell
5044 S. State Street
Chicago, IL 60609-5328
info@illinoisfordowell.com

April 10, 2025

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

Dear Ms. Dowell:

On March 11, 2025, the Federal Election Commission accepted the signed conciliation agreement submitted by you, Pat Dowell for Congress and Mattie Lacy in her official capacity as treasurer, and Citizens for Pat Dowell, in settlement of violations of 52 U.S.C. §§ 30125(e)(1)(A) and 30104(b), provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. §§ 110.3(d), 104.3(a)-(b), and 300.61, provisions of the Commission's regulations. Accordingly, the file has been closed 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). 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. Payment can be made online by debit, credit card, or automated clearing house (ACH) withdrawal, using this link to the government's secure portal for online collections: <https://www.pay.gov/public/form/start/316805379>. Payment can also be made by check or money order payable to the Federal Election Commission and sent via regular mail to the Federal Election Commission, 1050 First Street NE, Washington, DC 20463, or by courier or overnight delivery to the same address but with a different zip code (20002). Please write the matter number "MUR 7996 civil penalty" on the memo line of the check. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Dominique Dillenseger

Dominique Dillenseger
Attorney

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