



FEDERAL ELECTION COMMISSION
Washington, DC

VIA UPS - SIGNATURE REQUESTED

April 28, 2025

Saurav Ghosh, Esq.
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005

RE: MUR 8150
Passionforest, LLC
SOS America PAC and Gloria
Maggiolo in her official capacity as
treasurer

Dear Mr. Ghosh:

This is in reference to the Complaint you filed with the Federal Election Commission on July 25, 2023, concerning Passionforest, LLC and SOS America PAC and Gloria Maggiolo in her official capacity as treasurer (the "Committee"). The Commission found that there was reason to believe that Passionforest, LLC violated 11 C.F.R. § 110.1(g)(5) of the Commission's regulations by failing to provide required attribution information but dismissed the allegation that the Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 110.1(g)(4) by failing to report attribution information. The Commission also dismissed the allegations that Passionforest, LLC and the Committee knowingly made and accepted, respectively, a contribution in the name of another, in violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b). The Commission further dismissed the allegations that Passionforest, LLC and the Committee made and knowingly accepted, respectively, a foreign national contribution, in violation of 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(g). On March 26, 2025, a Conciliation Agreement signed by counsel for Passionforest, LLC 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 Factual and Legal Analyses and the Conciliation Agreement are enclosed for your information, along with any applicable Statements of Reasons available at the time of this letter's transmittal.

MUR 8150 (Passionforest, LLC, *et. al.*)

Mr. Ghosh

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If you have any questions, please contact Rachel Coll, the attorney assigned to this matter, at (202) 694-1650.

Sincerely

Mark Shonkwiler

BY: Mark Shonkwiler
Assistant General Counsel

Enclosure

FEDERAL ELECTION COMMISSION**FACTUAL AND LEGAL ANALYSIS****RESPONDENT:** Passionforest, LLC**MUR 8150****I. INTRODUCTION**

This matter arises from a Complaint alleging that Passionforest, LLC (“Passionforest”) allowed its name to be used to effect a \$500,000 contribution on October 28, 2022, to SOS America PAC and Gloria Maggiolo in her official capacity as treasurer (the “Committee”) on behalf of a true contributor or contributors in violation of the Federal Election Campaign Act of 1971, as amended (the “Act”). The Complaint further alleges that Passionforest may be owned and operated by one or more persons living in China and may therefore have been used to conceal contributions from foreign nationals. The Complaint bases these allegations on public information indicating that Passionforest did not have the financial means to make a \$500,000 contribution. Furthermore, the Complaint notes that Passionforest was allegedly registered as an LLC in Delaware and disclosed a Florida address in connection with the Committee’s contribution, whereas a U.S. Patent and Trademark Office application for the word “Passionforest” lists the patent applicant as a wholesaler of plastic flower arrangements at an address in Guangzhou, China.

Passionforest denies the allegations in its Response and states that the LLC referenced as “Passionforest” in the Complaint and the LLC that made the contribution to the Committee are two different entities and the latter has no connection to plastic flower arrangements or the city of Guangzhou. The Response states that Ivan Soto-Wright created the Passionforest entity that made the contribution in 2021 and that he funded it shortly thereafter to hold his assets.

1 Passionforest provided a sworn declaration from Soto-Wright in which he avers that he was the
2 sole provider of Passionforest's funds, and that none of its assets came from any foreign national.

3 The available information does not indicate that Passionforest received any funds for the
4 purpose of making a contribution. Accordingly, the Commission dismisses the allegations that
5 Passionforest knowingly permitted its name to be used to effect a contribution in the name of
6 another in violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b). Furthermore, the
7 Commission dismisses the allegations that Passionforest made a foreign national contribution in
8 violation of 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(b).

9 As for the proper attribution of the Passionforest contribution to Ivan Soto-Wright,
10 Passionforest acknowledged that it did not provide attribution information to the Committee at
11 the time it made the contribution or in response to an initial request from the Committee, but
12 rather did so only after a subsequent request from the Committee several months later when it
13 received notification of the Complaint. Accordingly, the Commission finds reason to believe
14 that Passionforest failed to provide attribution information to the Committee in violation of
15 11 C.F.R. § 110.1(g)(5).

16 **II. FACTUAL BACKGROUND**

17 Passionforest is a limited liability company that Ivan Soto-Wright established on
18 November 30, 2021, in Delaware, and its registered agent is Corporation Service Company.¹

¹ Passionforest Resp. (Sept. 20, 2023); Ivan Soto-Wright Decl. ¶ 3, Exhibit A (Sept. 19, 2023).

The Committee is an independent expenditure-only political committee (“IEOPC”) that registered with the Commission on January 20, 2022.² Its treasurer is Gloria Maggiolo.³ In its 2022 Post-General Report, the Committee reported receiving a \$500,000 contribution from “Passionforest, LLC” on October 28, 2022. The Committee initially identified Passionforest as a “flower wholesaler” and provided no attribution information associated with the contribution but stated in the Report that “contributor info has been requested for Passionforest LLC.”⁴ On July 25, 2023, the Complaint was filed in this matter and Soto-Wright became aware of the Complaint that same day.⁵ On July 31, 2023, in its 2023 Mid-Year Report, the Committee attributed the Passionforest contribution to Soto-Wright and stated in a memo entry that the “[c]ontribution was reported on Oct 28, 2022 with missing partnership attribution. . . . [R]elated Partnership Attribution to Passionforest LLC.”⁶

The Complaint alleges that Passionforest was not the true contributor of the \$500,000 contribution to the Committee.⁷ It bases this allegation on Passionforest’s lack of financial information available online through databases maintained by the Better Business Bureau, Bloomberg, the Securities and Exchange Commission, the Greater Miami Chamber of

² The Committee was originally named America for Everyone, *see* Am. For Everyone, Statement of Organization at 1 (Jan. 20, 2022), <https://docquery.fec.gov/pdf/701/202201209475067701/202201209475067701.pdf>. On June 2, 2023, the Committee filed an Amended Statement of Organization, changing its name to SOS America PAC, *see* SOS Am. PAC, Amended Statement of Organization at 1 (June 2, 2023), <https://docquery.fec.gov/pdf/988/202306029581699988/202306029581699988.pdf>.

³ SOS Am. PAC Amended Statement of Organization at 1 (June 28, 2022), <https://docquery.fec.gov/pdf/730/202306289582402730/202306289582402730.pdf>.

⁴ Am. For Everyone, 2022 Post-General Report at 8-9 (Dec. 8, 2022), <https://docquery.fec.gov/pdf/978/202212089550114978/202212089550114978.pdf>.

⁵ Soto-Wright Decl. ¶13; *see also* Press Release, Campaign Legal Ctr., CLC Alleges Straw Donor Scheme Funneled \$500,000 to Pro-Suarez Super PAC (July 25, 2023), <https://campaignlegal.org/document/clc-alleges-straw-donor-scheme-funneled-500000-pro-suarez-super-pac>.

⁶ SOS Am. PAC, 2023 Mid-Year Report at 25-26 (July 31, 2023), <https://docquery.fec.gov/pdf/638/202307319584587638/202307319584587638.pdf>.

⁷ Compl. ¶ 1 (July 25, 2023).

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Factual and Legal Analysis

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Commerce, or the Miami-Dade Chamber of Commerce, since the address disclosed in connection with the contribution at issue was in Miami, Florida.⁸ The Complaint concludes from the limited publicly available information concerning Passionforest that it did not have the financial means to make a \$500,000 contribution.⁹ Although the Complaint notes Passionforest’s registration as a Delaware domestic limited liability company, it alleges that the Committee’s reporting of Passionforest as a “flower wholesaler” is evidence that the relevant entity is an Amazon wholesaler of artificial flower arrangements with a U.S. Patent and Trademark Office application listing an address in China.¹⁰ On this basis the Complaint alleges that Passionforest was used as a straw donor to funnel a contribution from a foreign national in violation of the Act.¹¹

Passionforest responds that its contribution to the Committee came from Soto-Wright’s individual earnings and assets only and that its contribution was not a conduit contribution by a straw donor.¹² Soto-Wright avers that the use of Passionforest to make the contribution was a matter of financial convenience and not an effort to conceal Soto-Wright’s identity.¹³ The Response also denies that the contribution was made through a straw donor on behalf of a foreign national, stating that the Complaint connecting Passionforest the contributor to the Chinese wholesaler of plastic flower arrangements is a “clear case of mistaken identity” and that

⁸ *Id.* ¶ 13(c).

⁹ *Id.*

¹⁰ *Id.* ¶¶ 7, 9, 10, 13; *see also* SOS Am. PAC 2022 Post-General Report at 8 (Dec. 8, 2022), <https://docquery.fec.gov/pdf/978/202212089550114978/202212089550114978.pdf>.

¹¹ Compl. ¶¶ 31, 32.

¹² Soto-Wright Decl. ¶ 5; *see also* Passionforest Resp. at 5. Passionforest filed its Certificate of Formation on November 30, 2021, establishing the LLC 10 months and 28 days before it made the contribution to the Committee. *See* Passionforest LLC, Certificate of Formation.

¹³ Soto-Wright Decl. ¶ 14.

1 the Passionforest entity established by Soto-Wright has no affiliation with foreign nationals as
2 alleged in the Complaint.¹⁴ The Soto-Wright Declaration also denies that Passionforest is
3 involved in the business of selling artificial flowers and reiterates that all funds came from him, a
4 United States citizen, and not via any foreign national.¹⁵ Passionforest's Response states that
5 Soto-Wright is "the sole ultimate owner" that "Passionforest holds a number of assets," and that
6 "a primary purpose of establishing Passionforest is to hold these assets separate from [Soto-
7 Wright's] interest in MoonPay, Inc., a company of which [Soto-Wright is] co-founder and Chief
8 Executive Officer."¹⁶

9 Soto-Wright acknowledges in his declaration that the Committee sent him an attribution
10 form in December 2022, and that he did not return it, stating:

11 In December 2022, SOS America [PAC] sent me an attribution
12 form, asking if the contribution from Passionforest should be
13 attributed to an individual. Being unfamiliar with this form, I
14 forwarded the form to one of my employees, as I often do with
15 similar forms and other requests. My employee was also
16 unfamiliar with the form, and consulted with legal counsel, but
17 ultimately the form was not completed. For its part, SOS America
18 [PAC] did not follow up on the issue further (reaching out again
19 only this summer). As such, I assumed that it was not actually
20 necessary that I complete the form, and I did not pursue the matter
21 further.¹⁷

¹⁴ Passionforest Resp. at 5.

¹⁵ Soto-Wright Decl. ¶¶ 15, 16.

¹⁶ Passionforest Resp. at 2; Soto-Wright Decl. ¶ 5.

¹⁷ Soto-Wright Decl. ¶ 12.

III. LEGAL ANALYSIS

A. The Commission Dismisses the Allegation That Passionforest Allowed Its Name to Be Used to Make Contributions in the Name of Another in Violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b)

The Act provides that a contribution includes “any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.”¹⁸ The term “person” for purposes of the Act and Commission regulations includes partnerships, corporations, and “any other organization or group of persons.”¹⁹ The Act prohibits a person from making a contribution in the name of another person, knowingly permitting his or her name to be used to effect such a contribution, or knowingly accepting such a contribution.²⁰ The Commission’s regulations include illustrations of activities that constitute making a contribution in the name of another:

- (i) Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made; or
- (ii) Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source.²¹

Both the Act and the Commission’s implementing regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution.²²

¹⁸ 52 U.S.C. § 30101(8)(A).

¹⁹ *Id.* § 30101(11); 11 C.F.R. § 100.10.

²⁰ 52 U.S.C. § 30122.

²¹ 11 C.F.R. § 110.4(b)(2)(i)-(ii).

²² *See* 52 U.S.C. § 30122; 11 C.F.R. § 110.4.

Here, the available information does not indicate that Passionforest operated as a conduit for the contribution to the Committee. Rather, the available information indicates that Soto-Wright deposited his own assets into the LLC and there is no indication that another person provided the funds used to make the contribution to the LLC in violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b). Accordingly, the Commission dismisses the allegation that Passionforest violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b) by knowingly permitting its name to be used to effect a contribution in the name of another.

B. The Commission Dismisses the Allegation That Passionforest Made a Foreign National Contribution in Violation of 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(b)

The Act and Commission regulations prohibit any “foreign national” from directly or indirectly making a contribution or donation of money or other thing of value, or an expenditure, independent expenditure, or disbursement, in connection with a federal, state, or local election.²³ The Act and Commission regulations further prohibit a person from knowingly accepting a contribution from a foreign national.²⁴ The Act’s definition of “foreign national” includes an individual who is not a citizen or national of the United States and who is not lawfully admitted for permanent residence.²⁵

The Complaint in this matter identified a trademark application for the word “Passionforest” in connection with the sale of artificial flowers, whose applicant provided an address in China.²⁶ The Complaint further notes that matching graphics on an Amazon seller

²³ 52 U.S.C. § 30121(a)(1); 11 C.F.R. § 110.20(b)-(c), (e)-(f).

²⁴ 52 U.S.C. § 30121(a)(2); 11 C.F.R. § 110.20(g).

²⁵ 52 U.S.C. § 30121(b); *see also* 11 C.F.R. § 110.20(a)(3).

²⁶ Compl. ¶ 10.

page display an address in Shenzhen, China and that a U.S. Patent and Trademark Office application for the word “Passionforest” lists the patent applicant as a wholesaler of plastic flower arrangements at an address in Guangzhou, China.²⁷ Based on this information, the Complaint alleges that Passionforest may be owned and operated by persons living in China, suggesting that the LLC may have been used to conceal illegal foreign national contributions.²⁸

Passionforest denies any connection to “plastic flower arrangements, online commerce, [the trademark applicant], or the city of Guangzhou,” and states that the Complaint’s allegation is a “clear case of mistaken identity.”²⁹ In addition, Soto-Wright avers that “Passionforest is not involved in the business of selling artificial flowers” [and that] “[a]ll of Passionforest’s funds and other assets were provided by me, a United States citizen.”³⁰

Given the information provided, the Commission dismisses the allegation that Passionforest violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(b) by making a foreign national contribution.

C. The Commission Finds Reason to Believe That Passionforest Violated 11 C.F.R. § 110.1(g)(5) by Failing to Provide Required Attribution Information

The treasurer of an unauthorized political committee is responsible for reporting the identification of each person whose aggregate contributions exceed \$200 per calendar year, together with the date and amount of any such contribution.³¹ Commission regulations require committees to report certain attribution information for contributions from limited liability

²⁷ *Id.* ¶¶ 11, 12; see also *Passionforest*, AMAZON, <https://www.amazon.com/sp?ie=UTF8&seller=A2B0IPN9HH390U&asin=B09NN9NKT7> (last visited August 15, 2024).

²⁸ Compl. ¶ 4.

²⁹ *Passionforest Resp.* at 3, 6.

³⁰ *Soto-Wright Decl.* ¶¶ 15, 16.

³¹ 52 U.S.C. § 30104(b)(3)(A); 11 C.F.R. § 104.3(a)(4).

companies.³² Contributions by an LLC that has a single natural-person member and is not taxed as a corporation, *i.e.*, a tax-disregarded entity, must be attributed only to the LLC's single natural-person member.³³ Furthermore, when an LLC makes a contribution, it must affirm to the recipient, at the time the LLC makes the contribution, that it is eligible to make a contribution and "provide information to the recipient committee as to how the contribution is to be attributed."³⁴

Although the Commission's regulations concerning the attribution of LLC contributions were promulgated prior to developments in the law that led to the creation of IEOPCs (such as the recipient committee in this matter), they apply on their face to all political committees and neither Congress, courts nor the Commission has exempted IEOPCs from their application.³⁵ These regulations uphold the Act's reporting framework and inhibit attempts to circumvent the Act's contribution source prohibitions and amount limitations, including prohibitions applicable to IEOPCs.³⁶ The Commission has recognized that LLCs must affirmatively provide attribution information when making political contributions so that the recipient committees can accurately disclose those contributions to the public.³⁷

³² See 11 C.F.R. § 110.1(g).

³³ *Id.* § 110.1(g)(4).

³⁴ *Id.* § 110.1(g)(5).

³⁵ See Statement of Reasons of Chairman Dickerson, Vice Chair Walther and Comm'rs Broussard and Weintraub at 2, MUR 7454 (Blue Magnolia, *et al.*); Factual & Legal Analysis ("F&LA") at 14-15, MUR 7464 (LZP, LLC) (citing 52 U.S.C. §§ 30116(a)(1), 30118(a)); Treatment of Limited Liability Companies Under the Federal Election Campaign Act, 64 Fed. Reg. 37,397, 37,398-99 (July 12, 1999) ("LLC E&J") (discussing role of LLC attribution rules in identifying prohibited contributions from foreign national or government contractor sources, concerns that apply to all LLC contributions, including contributions to IEOPCs).

³⁶ See 52 U.S.C. §§ 30116(a)(1), 30118(a); LLC E&J, 64 Fed. Reg. at 37,398-99.

³⁷ F&LA at 14-15, MUR 7464 (LZP, LLC) (citing LLC E&J, 64 Fed. Reg. at 37,399 ("The Commission further notes that the recipient committee would have no way of knowing how to attribute a contribution made by an eligible multi-member or single member LLC, unless that information was provided.")).

1 In the instant matter, Passionforest did not attribute the contribution to Soto-Wright at the
 2 time the contribution was made as is required by Commission regulations.³⁸ Nine months later,
 3 after the Complaint was filed, Passionforest attributed the contribution to Soto-Wright, which is
 4 reflected in the Committee’s 2023 Mid-Year Report filed on July 31, 2023.³⁹

5 The Passionforest Response identifies Soto-Wright as the “sole member of the LLC.”⁴⁰
 6 In his declaration, Soto-Wright states that he is the “sole ultimate owner” of the assets held by
 7 Passionforest,⁴¹ evidencing that Passionforest did not elect to be treated as a corporation by the
 8 Internal Revenue Service. Accordingly, pursuant to 11 C.F.R. § 110.1(g)(4), Passionforest’s
 9 contributions should have been attributed to the LLC’s single member, Soto-Wright.⁴²

10 Therefore, the Commission finds reason to believe that Passionforest violated 11 C.F.R.
 11 § 110.1(g)(5) by failing to provide attribution information required by 11 C.F.R. § 110.1(g)(4) to
 12 the recipient Committee at the time Passionforest made the contribution.

³⁸ See Soto-Wright Decl. ¶¶ 5, 12 (acknowledging a request from the Committee for information regarding the Passionforest contribution and admitting that he did not respond on behalf of the LLC).

³⁹ SOS Am. PAC, 2023 Mid-Year Report at 25-26 (July 31, 2023), <https://docquery.fec.gov/pdf/638/202307319584587638/202307319584587638.pdf>

⁴⁰ Passionforest Resp. at 2.

⁴¹ Soto-Wright Decl. ¶ 8.

⁴² Passionforest Resp. at 2; 11 C.F.R. § 110.1(g)(5) (stating that an LLC that makes a contribution pursuant to paragraph (g)(2) or (g)(4) of this section shall, at the time it makes the contribution, provide information to the recipient committee as to how the contribution is to be attributed, and affirm to the recipient committee that it is eligible to make the contribution).

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: SOS America PAC and Gloria Maggiolo in her official capacity as treasurer **MUR 8150**

The Complaint in this matter alleges that Passionforest, LLC (“Passionforest”) allowed its name to be used to effect a \$500,000 contribution on October 28, 2022, to SOS America PAC and Gloria Maggiolo in her official capacity as treasurer (the “Committee”) on behalf of a true contributor or contributors in violation of the Federal Election Campaign Act of 1971, as amended (the “Act”). The Complaint further alleges that Passionforest may be owned and operated by one or more persons living in China and may therefore have been used to conceal contributions from foreign nationals. The Complaint bases these allegations on public information indicating that Passionforest did not have the financial means to make a \$500,000 contribution. Furthermore, the Complaint notes that Passionforest was allegedly registered as an LLC in Delaware and disclosed a Florida address in connection with the Committee’s contribution, whereas a U.S. Patent and Trademark Office application for the word “Passionforest” lists the patent applicant as a wholesaler of plastic flower arrangements at an address in Guangzhou, China.

In its Response, the Committee asserts that the Complaint does not allege that it knowingly accepted an unlawful contribution or otherwise violated the Act, that the foreign national contribution allegation is speculative, and that the Committee timely filed a report, subsequent to the initial report disclosing the contribution, showing that the source of the contribution was lawful.

1 The available information does not indicate that Passionforest received any funds for the
2 purpose of making a contribution to the Committee. Accordingly, the Commission dismisses the
3 allegations that the Committee knowingly accepted a contribution in the name of another in
4 violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b). Furthermore, the Commission
5 dismisses the allegations that the Committee knowingly accepted a foreign national contribution
6 in violation of 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(g).

7 As for the proper attribution of the Passionforest contribution, because it appears that the
8 Committee made best efforts to attempt to clarify the information it received or otherwise obtain
9 attribution information, the Commission dismisses the allegation that the Committee failed to
10 attribute a contribution by a partnership in violation of 52 U.S.C. § 30104(b) and 11 C.F.R.
11 § 110.1(g)(4).

12 **II. FACTUAL BACKGROUND**

13 Passionforest is a limited liability company. The Committee is an independent
14 expenditure-only political committee (“IEOPC”) that registered with the Commission on
15 January 20, 2022.¹ Its treasurer is Gloria Maggiolo.² In its 2022 Post-General Report, the
16 Committee reported receiving a \$500,000 contribution from “Passionforest, LLC” on
17 October 28, 2022. The Committee initially identified Passionforest as a “flower wholesaler” and
18 provided no attribution information associated with the contribution but stated in the Report that

¹ The Committee was originally named America for Everyone, *see* Am. for Everyone, Statement of Organization at 1 (Jan. 20, 2022), <https://docquery.fec.gov/pdf/701/202201209475067701/202201209475067701.pdf>. On June 2, 2023, the Committee filed an Amended Statement of Organization, changing its name to SOS America PAC, *see* SOS Am. PAC, Amended Statement of Organization at 1 (June 2, 2023), <https://docquery.fec.gov/pdf/988/202306029581699988/202306029581699988.pdf>.

² SOS Am. PAC, Amended Statement of Organization at 1, (June 28, 2022), <https://docquery.fec.gov/pdf/730/202306289582402730/202306289582402730.pdf>.

“contributor info has been requested for Passionforest LLC.”³ On July 25, 2023, the Complaint was filed in this matter and on July 31, 2023, in its 2023 Mid-Year Report, the Committee attributed the Passionforest contribution to Ivan Soto-Wright and stated in a memo entry that the “[c]ontribution was reported on Oct 28, 2022 with missing partnership attribution . . . [R]elated Partnership Attribution to Passionforest LLC.”⁴

The Complaint alleges that Passionforest was not the true contributor of the \$500,000 contribution to the Committee.⁵ It bases this allegation the lack of financial information available online through the Better Business Bureau, Bloomberg, the Securities and Exchange Commission, the Greater Miami Chamber of Commerce, or the Miami-Dade Chamber of Commerce, since the address disclosed in connection with the contribution at issue was in Miami, Florida.⁶ The Complaint concludes from the limited publicly available information concerning Passionforest that it did not have the financial means to make a \$500,000 contribution.⁷ Although the Complaint notes Passionforest’s registration as a Delaware domestic limited liability company, it alleges that the Committee’s reporting of Passionforest as a “flower wholesaler” is evidence that the relevant entity is an Amazon wholesaler of artificial flower arrangements with a U.S. Patent and Trademark Office application listing an address in China.⁸

³ Am. for Everyone, 2022 Post-General Report at 8-9 (Dec. 8, 2022), <https://docquery.fec.gov/pdf/978/202212089550114978/202212089550114978.pdf>.

⁴ SOS Am. PAC, 2023 Mid-Year Report at 25-26 (July 31, 2023), <https://docquery.fec.gov/pdf/638/202307319584587638/202307319584587638.pdf>.

⁵ Compl. ¶ 1 (July 25, 2023).

⁶ *Id.* ¶ 13(c).

⁷ *Id.*

⁸ *Id.* ¶¶ 7, 9, 10, 13; *see also* SOS Am. PAC, 2022 Post-General Report at 8 (Dec. 8, 2022), <https://docquery.fec.gov/pdf/978/202212089550114978/202212089550114978.pdf>.

On this basis the Complaint alleges that Passionforest was used as a straw donor to funnel a contribution from a foreign national in violation of the Act.⁹

The available information shows that the Passionforest contribution was not a conduit contribution by a straw donor and the use of Passionforest to make the contribution was a matter of financial convenience and not an effort to conceal contributor identity. Additional information shows that the contribution was not made through a straw donor on behalf of a foreign national, and Passionforest has no affiliation with foreign nationals as alleged in the Complaint. Information also shows that the Committee sent Passionforest an attribution form in December 2022, and it was not returned timely by the LLC.

In its Response the Committee asserts the Complaint does not suggest that the Committee knowingly accepted an unlawful contribution or otherwise violated the Act, that the foreign national contribution allegation was speculative, and that the Committee timely filed a subsequent report disclosing that the source of the contribution was lawful.¹⁰

III. LEGAL ANALYSIS

A. The Commission Dismisses the Allegation That SOS America PAC Knowingly Accepted Contributions in the Name of Another in Violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b)

The Act provides that a contribution includes “any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.”¹¹ The term “person” for purposes of the Act and Commission regulations includes partnerships, corporations, and “any other organization or group of

⁹ Compl. ¶¶ 31, 32.

¹⁰ SOS Am. PAC Resp. at 1 (Feb. 13, 2024).

¹¹ 52 U.S.C. § 30101(8)(A).

persons.”¹² The Act prohibits a person from making a contribution in the name of another person, knowingly permitting his or her name to be used to effect such a contribution, or knowingly accepting such a contribution.¹³ The Commission’s regulations include illustrations of activities that constitute making a contribution in the name of another:

- (i) Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made; or
- (ii) Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source.¹⁴

Both the Act and the Commission’s implementing regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution.¹⁵

Here, the available information does not indicate that Passionforest operated as a conduit for the contribution to the Committee. Accordingly, the Commission dismisses the allegation that SOS America PAC violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b) by knowingly accepting a contribution in the name of another.

B. The Commission Dismisses the Allegation That SOS America PAC Knowingly Accepted a Foreign National Contribution in Violation of 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(g)

The Act and Commission regulations prohibit any “foreign national” from directly or indirectly making a contribution or donation of money or other thing of value, or an expenditure,

¹² *Id.* § 30101(11); 11 C.F.R. § 100.10.

¹³ 52 U.S.C. § 30122.

¹⁴ 11 C.F.R. § 110.4(b)(2)(i)-(ii).

¹⁵ *See* 52 U.S.C. § 30122; 11 C.F.R. § 110.4.

independent expenditure, or disbursement, in connection with a federal, state, or local election.¹⁶

The Act and Commission regulations further prohibit a person from knowingly accepting a contribution from a foreign national.¹⁷

The Complaint in this matter identified a trademark application for the word “Passionforest” in connection with the sale of artificial flowers, whose applicant provided an address in China.¹⁸ The Complaint further notes that matching graphics on an Amazon seller page display an address in Shenzhen, China, and that a U.S. Patent and Trademark Office application for the word “Passionforest” lists the patent applicant as a wholesaler of plastic flower arrangements at an address in Guangzhou, China.¹⁹

Information shows that Passionforest has no connection to plastic flower arrangements, online commerce, the trademark applicant, or the city of Guangzhou. As such, the information contained in the record does not support a finding that Passionforest served as means for a direct or indirect contribution from a foreign national.

Accordingly, the Commission dismisses the allegation that SOS America PAC violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(g) by knowingly accepting a foreign national contribution.

¹⁶ 52 U.S.C. § 30121(a)(1); 11 C.F.R. § 110.20(b)-(c), (e)-(f).

¹⁷ 52 U.S.C. § 30121(a)(2); 11 C.F.R. § 110.20(g).

¹⁸ Compl. ¶ 10.

¹⁹ *Id.* ¶¶ 11, 12; *see also* *Passionforest*, AMAZON, Amazon, <https://www.amazon.com/sp?ie=UTF8&seller=A2B01PN9HH390U&asin=B09NN9NKT7> (last visited August 15, 2024).

C. The Commission Dismisses the Allegation That SOS America PAC Violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 110.1(g)(4) by Failing to Report Attribution Information

The treasurer of an unauthorized political committee is responsible for reporting the identification of each person whose aggregate contributions exceed \$200 per calendar year, together with the date and amount of any such contribution.²⁰ Commission regulations require committees to report certain attribution information for contributions from limited liability companies.²¹ Contributions by an LLC that has a single natural-person member and is not taxed as a corporation, *i.e.*, a tax-disregarded entity, must be attributed only to the LLC's single natural-person member.²² Furthermore, when an LLC makes a contribution, it must affirm to the recipient, at the time the LLC makes the contribution, that it is eligible to make a contribution and "provide information to the recipient committee as to how the contribution is to be attributed."²³

Although the Commission's regulations concerning the attribution of LLC contributions were promulgated prior to developments in the law that led to the creation of IEOPCs (such as the recipient committee in this matter), they apply on their face to all political committees and neither Congress, courts nor the Commission has exempted IEOPCs from their application.²⁴ These regulations uphold the Act's reporting framework and inhibit attempts to circumvent the

²⁰ 52 U.S.C. § 30104(b)(3)(A); 11 C.F.R. § 104.3(a)(4).

²¹ *See* 11 C.F.R. § 110.1(g).

²² 11 C.F.R. § 110.1(g)(4).

²³ *Id.* § 110.1(g)(5).

²⁴ *See* Statement of Reasons of Chairman Dickerson, Vice Chair Walther and Comm'rs Broussard and Weintraub at 2, MUR 7454 (Blue Magnolia, *et al.*); Factual & Legal Analysis ("F&LA") at 14-15, MUR 7464 (LZP, LLC) (citing 52 U.S.C. §§ 30116(a)(1), 30118(a)); Treatment of Limited Liability Companies Under the Federal Election Campaign Act, 64 Fed. Reg. 37,397, 37,398-99 (July 12, 1999) ("LLC E&J") (discussing role of LLC attribution rules in identifying prohibited contributions from foreign national or government contractor sources, concerns that apply to all LLC contributions, including contributions to IEOPCs).

Act’s contribution source prohibitions and amount limitations, including prohibitions applicable to IEOPCs.²⁵ The Commission has recognized that recipient committees must seek attribution information so that the recipient committees can accurately disclose those contributions to the public.²⁶

When a treasurer of a political committee shows that the committee used “best efforts” to obtain, maintain, and submit the information required by the Act, the committee’s reports will be considered in compliance with the Act.²⁷ Best efforts require, among other things, that all written solicitations contain a clear request for the necessary information and that, “[f]or each contribution . . . which lacks required contributor information,” the recipient committee must make at least one effort to obtain the missing information within 30 days after the receipt of the contribution, in either a written request or a documented oral request.²⁸ If the treasurer receives missing contributor information after submitting a report, the treasurer either files an amendment to the report originally disclosing the contribution to provide the missing contributor information or includes the missing contributor information on an amended memo Schedule A with the next regularly scheduled report.²⁹ Best efforts require political committees and their treasurers to

²⁵ See 52 U.S.C. §§ 30116(a)(1), 30118(a); LLC E&J, 64 Fed. Reg. at 37,398-99.

²⁶ LLC E&J, 64 Fed. Reg. at 37,399 (“The Commission further notes that the recipient committee would have no way of knowing how to attribute a contribution made by an eligible multi-member or single member LLC, unless that information was provided.”); F&LA at 5, MUR 7454 (DefendArizona) (finding that the recipient IEOPC failed to seek attribution information so that it could accurately disclose the contribution, as required under 11 C.F.R. § 110.1(e)).

²⁷ 52 U.S.C. § 30102(i); 11 C.F.R. § 104.7(a).

²⁸ 11 C.F.R. § 104.7(b).

²⁹ *Id.* § 104.7(b)(4)(i).

“show[] that best efforts have been used to obtain, maintain, and submit the information required. . . .”³⁰

At the time Passionforest made its contribution to the Committee, it did not provide attribution information to the Committee. The Committee disclosed its receipt of the contribution in its 2022 Post-General Report along with a statement that it requested contributor information from Passionforest.³¹ Information shows that Passionforest received, but did not respond to the Committee’s request, and that only a second request from the Committee, after the Complaint was filed, appears to have prompted Passionforest to disclose the attribution information to the Committee, which the Committee disclosed in its 2023 Mid-Year Report.³²

The Committee made attempts to obtain attribution information for Passionforest LLC’s contribution between the October 2022 contribution and the July 2023 disclosure, and the record is now corrected. The available information indicates that the Committee made its first request for the Passionforest contribution attribution information between December 1, 2022 and December 8, 2022, which, while not within the 30-day period set forth in the Commission’s regulations, which ended on November 27, 2022, was at most only 11 days late.³³ After the Committee’s second request, following notification of the Complaint, Passionforest provided the

³⁰ 52 U.S.C. § 30102(i); *see also* Statement of Policy Regarding Treasurers’ Best Efforts to Obtain, Maintain, and Submit Information as Required by the Federal Election Campaign Act, 72 Fed. Reg. 31,438, 31,440 (June 7, 2007).

³¹ Am. For Everyone, 2022 Post-General Report at 8-9 (Dec. 8, 2022), <https://docquery.fec.gov/pdf/978/202212089550114978/202212089550114978.pdf>.

³² *See* SOS Am. PAC, 2023 Mid-Year Report at 25-26 (July 31, 2023), <https://docquery.fec.gov/pdf/638/202307319584587638/202307319584587638.pdf>.

³³ *See* 11 C.F.R. § 104.7(b)(2).

1 attribution information to the Committee, which disclosed it on its next report consistent with the
2 Commission's regulations.³⁴

3 Accordingly, the Commission dismisses the allegation that SOS America PAC violated
4 52 U.S.C. § 30104(b) and 11 C.F.R. § 110.1(g)(4) by failing to report attribution information.

³⁴ See *id.* § 104.7(b)(4)(i)(A).

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Passionforest, LLC

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MUR 8150

CONCILIATION AGREEMENT

This matter was generated by a Complaint filed with the Federal Election Commission. The Commission found reason to believe that Passionforest, LLC (“Passionforest” or “Respondent”) violated 11 C.F.R. § 110.1(g)(5) of the Commission’s regulations by failing to report attribution information.

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

I. The Commission has jurisdiction over 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 and law in this matter are as follows:

1. Passionforest is a Delaware company that incorporated on November 30, 2021. It is a single-member LLC that has not elected to be taxed as a corporation whose sole member is Ivan Soto-Wright.

2. SOS America is an independent expenditure-only political committee (“IEOPC”) that first registered with the Commission on January 20, 2022; Gloria Maggiolo is its treasurer.

3. Passionforest made a \$500,000 contribution to SOS America on October 28, 2022, and did not provide information to the Committee at that time regarding how its contribution should be attributed nor did Passionforest do so in response to an initial request from SOS America. The contribution should have been attributed to Ivan Soto-Wright because he was Passionforest’s single member. Passionforest provided attribution information to the Committee after a subsequent request from the Committee in July 2023 when the Complaint in this matter was filed. SOS America amended its 2022 Post-General Report to attribute the full amount of the contribution reportedly made by Passionforest to Ivan Soto-Wright.

4. The treasurer of an unauthorized political committee is responsible for reporting the identification of each person whose aggregate contributions exceed \$200 per calendar year, together with the date and amount of any such contribution. 52 U.S.C. § 30104(b)(3)(A); 11 C.F.R. § 104.3(a)(4). Commission regulations require committees to report certain attribution information for contributions from limited liability companies. *See* 11 C.F.R. § 110.1(g). Contributions by an LLC that has a single natural-person member and is not taxed as a corporation, *i.e.*, a tax-disregarded entity, must be attributed only to the LLC’s single natural-person member. *Id.* § 110.1(g)(4). Furthermore, when an LLC makes a contribution, it must affirm to the recipient, at the time the LLC makes the contribution, that it is eligible to make a contribution and “provide information to the recipient committee as to how the contribution is to be attributed.” *Id.* § 110.1(g)(5).

V. Respondent violated 11 C.F.R. § 110.1(g)(5) by failing to provide attribution information to the recipient Committee at the time the contribution was made.

VI. Respondent will take the following actions:

1. Under ordinary circumstances, the Commission would seek a civil penalty based on the violation outlined in this Agreement. While the Commission is not seeking a civil penalty in this matter, it reserves its right to seek a monetary penalty in future matters concerning this violation.

2. Respondent will cease and desist from committing further violations of 11 C.F.R. § 110.1(g)(5).

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 Commission and Respondent and constitutes a final settlement as to Respondent concerning the facts and violation described in Paragraphs IV and V of this Conciliation Agreement. No other

MUR 8150 (Passionforest, LLC)
Conciliation Agreement
Page 4 of 4

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 Digitally signed by Lisa Jane Stevenson
Date: 2025.04.21 11:16:17 -04'00'

Lisa J. Stevenson
Acting General Counsel

Date

FOR RESPONDENT:



(Name) Samuel C. Brown
(Position) Partner, Holland & Knight LLP

2/25/2025

Date



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matters of)	
)	
The Freedom Forward Fund, <i>et al.</i>)	MUR 7981
Make America Great Again, Again! Inc., <i>et al.</i>)	MUR 7994
Tread Standard, LLC, <i>et al.</i>)	MUR 8002
Ala. Conservatives Fund, <i>et al.</i>)	MUR 8008
Snow Goose, LLC, <i>et al.</i>)	MUR 8019
Passionforest, LLC, <i>et al.</i>)	MUR 8150

**SUPPLEMENTAL STATEMENT OF REASONS OF COMMISSIONERS
SHANA M. BROUSSARD, ALLEN J. DICKERSON, DARA LINDENBAUM, AND
JAMES E. “TREY” TRAINOR**

On February 27, 2024, the Commission considered several matters with complaints that generally alleged the making of conduit contributions to various committees through limited liability companies (“LLCs”), in violation of the Federal Election Campaign Act’s prohibition on the making of contributions in the name of another.¹ We rejected the premise that the contributions were made in the name of another and instead identified the issue as whether the respondents correctly attributed the contributions made by LLCs. Specifically, we voted to find reason to believe as to some of the LLCs for failing to provide, and as to some of the recipient committees for failing to report, the required attribution information, and directed the Office of

¹ Certification (“Cert.”) (Feb. 27, 2024), MUR 7981 (The Freedom Forward Fund, *et al.*); Cert. (Feb. 27, 2024), MUR 7994 (Make America Great Again, Again!, *et al.*); Amended Cert. (Feb. 27, 2024), MUR 8002 (Tread Standard, LLC, *et al.*); Second Amended Cert. (Feb. 27, 2024), MUR 8008 (Ala. Conservatives Fund, *et al.*); Amended Cert. (Feb. 27, 2024), MUR 8019 (Snow Goose, LLC, *et al.*).

General Counsel to draft appropriate Factual and Legal Analyses and Conciliation Agreements reflecting those findings.²

Additionally, in a September 14, 2024 Statement of Reasons by the four Commissioners that currently comprise the Commission, we outlined our approach to these matters and how we planned to proceed in similar matters going forward.³ On January 14, 2025, the Commission adopted Factual and Legal Analyses and Conciliation Agreements explaining how our approach applied to the facts of these matters.⁴ And finally, at the Commission’s January 30, 2025 Open Meeting, we adopted a sample donor response form as an example of how a recipient committee that receives contributions from LLC may exercise best efforts in collecting and correctly reporting LLC attribution information.⁵

² Cert. ¶¶ 3-4 (Feb. 27, 2024), MUR 7981 (The Freedom Forward Fund, *et al.*) (finding RTB against both the LLC and recipient committee); Cert. ¶ 2 (Feb. 27, 2024), MUR 7994 (Make America Great Again, Again!, *et al.*) (finding RTB against recipient committee); Amended Cert. ¶¶ 2-3 (Feb. 27, 2024), MUR 8002 (Tread Standard, LLC, *et al.*) (finding RTB against both recipient committees and the LLC); Second Amended Cert. ¶¶ 4-6 (Feb. 27, 2024), MUR 8008 (Ala. Conservatives Fund, *et al.*) (finding RTB against the recipient committee but dismissing the LLC); Amended Cert. ¶¶ 2-3 (Feb. 27, 2024), MUR 8019 (Snow Goose, LLC, *et al.*) (dismissing the LLC but finding RTB against the recipient committee). For one of the above-captioned matters, the Commission found reason to believe simultaneous with its adoption of Factual and Legal Analyses and Conciliation Agreement on January 14, 2025. Cert. ¶ 1, MUR 8150 (Passionforest, LLC, *et al.*) (finding RTB against the LLC); *infra* note 4 and accompanying text.

³ Statement of Reasons (“SOR”), Comm’rs Shana M. Broussard, Allen J. Dickerson, Dara Lindenbaum, and James E. “Trey” Trainor, III (Sept. 13, 2024), MURs 7981 (Freedom Forward Fund, *et al.*), 8002 (Tread Standard, LLC, *et al.*), 8008 (Ala. Conservatives Fund, *et al.*), and 8019 (Snow Goose, LLC, *et al.*) (stating that in these and future matters concerning single-member and partnership LLCs, the Commission will proceed against the LLC if it failed to provide correct attribution information; excuse the contributor if the LLC provided correct attribution information within 30 days; dismiss where a recipient committee demonstrates best efforts to obtain attribution information; or pursue a committee that neither exercises best efforts nor accurately reports LLC contributions).

⁴ Cert. ¶¶ 1-2 (Jan. 14, 2025), MUR 7981 (Freedom Forward Fund, *et al.*); Cert. ¶¶ 1-2, MUR 7994 (Make America Great Again, Again!, *et al.*); Cert. ¶¶ 1-2 (Jan. 14, 2025), MUR 8002 (Tread Standard, LLC, *et al.*); Amended Cert. ¶¶ 1-2 (Jan. 14, 2025), MUR 8008 (Ala. Conservatives Fund, *et al.*); Amended Cert. ¶¶ 1-2 (Jan. 14, 2025), MUR 8019 (Snow Goose, LLC, *et al.*); Cert. ¶¶ 1.i, 2, MUR 8150 (Passionforest, LLC, *et al.*).

⁵ Memorandum to the Commission Regarding Sample Donor Response Form for Contributions by LLCs, Agenda Doc.24-53-A (Nov. 21, 2024), <https://www.fec.gov/resources/cms-content/documents/mtgdoc-24-53-A.pdf> (describing the attached sample donor response form to be “used as an example for committees that seek and accept contributions from LLCs,” which “will satisfy the recipient committee’s ‘best efforts’ obligations”).

However, we declined to assess a civil penalty in these matters out of concern that the public lacked sufficient notice regarding this approach and in the interest of fairness by treating matters that the Commission was considering simultaneously in a consistent manner.⁶ With the conclusion of these matters, we no longer consider there to be a risk of insufficient notice or inconsistent treatment. Accordingly, we intend to pursue civil penalties in future matters presented where single-member or partnership LLCs fail to provide attribution information when making contributions, and where those recipient committees fail to exercise best efforts and inaccurately attribute an LLC contribution.

March 12, 2025

Date



Shana M. Broussard
 Commissioner

March 12, 2025

Date



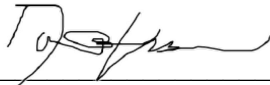
Allen J. Dickerson
 Commissioner

⁶ Cert. ¶ 2 (Jan. 14, 2025), MUR 7981 (Freedom Forward Fund, *et al.*); Cert. ¶ 2, MUR 7994 (Make America Great Again, Again!, *et al.*); Cert. ¶ 2 (Jan. 14, 2025), MUR 8002 (Tread Standard, LLC, *et al.*); Amended Cert. ¶ 2 (Jan. 14, 2025), MUR 8008 (Ala. Conservatives Fund, *et al.*); Amended Cert. ¶ 2 (Jan. 14, 2025), MUR 8019 (Snow Goose LLC, *et al.*); Cert. ¶ 2, MUR 8150 (Passionforest, LLC, *et al.*). Arguably, the regulated community was on sufficient notice that the Commission would pursue civil penalties for these types of violations, at latest, as of April 2022 when the four-Commissioner Statement of Reasons in MUR 7454 (Blue Magnolia Investments, LLC, *et al.*) was released. See SOR at 2-3, Chairman Allen Dickerson, Vice Chair Steven T. Walther, Comm'r Shana M. Broussard, and Comm'r Ellen L. Weintraub (Apr. 15, 2022), MUR 7454 (Blue Magnolia Investments, LLC, *et al.*) (clarifying that "there is no longer a lack of clarity concerning the application of LLC reporting rules and conduit contribution rules in these circumstances" and that "going forward" the Commission would apply its understanding that "contributions from LLCs to committees must be attributed pursuant to Commission regulations, and those regulations apply to all committees, including IEOPCs" and "seek civil penalties in appropriate future cases"). However, these matters almost exclusively involved contributions made prior to April 2022, which informed our concerns about sufficient notice and consistent treatment. Factual & Legal Analysis ("F&LA") at 2, MUR 7981 (Teeter Jay, LLC, *et al.*) (May 2021 contributions); F&LA at 2, MUR 7994 (Make America Great Again, Again! Inc.) (November 2021 contribution); F&LA at 2, MUR 8002 (Tread Standard, LLC) (November 2022 and March 2022 contributions); F&LA at 2, MUR 8008 (Ala. Conservatives Fund) (January 2022 contribution); F&LA at 2, MUR 8019 (Wyoming Values) (February 2022 contribution). But see F&LA at 3, MUR 8150 (Passionforest, LLC) (October 2022 contribution).

MURs 7981, 7994, 8002, 8008, 8019, 8150
Supplemental Statement of Reasons
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March 12, 2025
Date



Dara Lindenbaum
Commissioner

March 12, 2025
Date



James E. "Trey" Trainor, III
Commissioner