



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**VIA ELECTRONIC MAIL**

Leilani R. Beaver, Esq.  
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May 30, 2025

RE: MUR 8270

Dear Ms. Beaver:

On April 29, 2025, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of Citizens for Waters in settlement of violations of 52 U.S.C. §§ 30102(h)(2), 30104(b)(1)-(5), and 30116(f), provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. §§ 102.11, 104.3(a), (b), and 110.9, provisions of the Commission's regulations. Accordingly, the Commission has closed the file in this matter.

The Commission will place documents related to the case 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, as well as any applicable Statements of Reasons available at the time of this letter's transmittal. 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

MUR 8270 (Citizens for Waters)

Page 2 of 2

number "MUR 8270 civil penalty" on the memo line of the check.

If you have any questions, please contact Jacob McCall, the attorney assigned to this matter, at (202) 694-1650 or [jmccall@fec.gov](mailto:jmccall@fec.gov).

Sincerely,

Lisa Stevenson  
Acting General Counsel

A handwritten signature in cursive script that reads "Ana J. Peña-Wallace".

BY: Ana J. Peña-Wallace  
Assistant General Counsel

Enclosure

# BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of	)	
	)	
Citizens for Waters and David Gould in his	)	MUR 8270
official capacity as treasurer	)	
	)	

## CONCILIATION AGREEMENT

This matter was initiated pursuant to information ascertained by the Federal Election Commission in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Citizens for Waters and David Gould in his official capacity as treasurer (“Respondent” or the “Committee”) violated 52 U.S.C. § 30104(b)(1)-(5) and 11 C.F.R. § 104.3(a), (b) by failing to accurately report receipts and disbursements, 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by knowingly accepting excessive contributions, and 52 U.S.C. § 30102(h)(2) and 11 C.F.R. § 102.11 by making prohibited cash disbursements.

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

- I. The Commission has jurisdiction over 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. During the relevant period, the Committee was the principal campaign committee of Maxine Waters, who is the Representative for California's Forty-Third Congressional District. David Gould is its treasurer.

Misstatement of Receipts and Disbursements

2. The Federal Election Campaign Act of 1971, as amended (the "Act") and Commission regulations require committees to file reports disclosing the total amount of receipts and disbursements for the reporting period and for the calendar year. 52 U.S.C. § 30104(b)(1), (2), (4); 11 C.F.R. § 104.3(a)(1). For each receipt or disbursement exceeding \$200, the committee must report the source, date, and amount of each receipt and the ultimate payee, purpose, amount, and date of each disbursement. 52 U.S.C. § 30104(b)(3), (5); 11 C.F.R. § 104.3(a)(4), (b)(3), (b)(4).

3. During the 2020 calendar year, the Committee understated \$262,391 in receipts and \$256,164 in disbursements. The Committee untimely amended its reports to correct these errors.

4. The Committee contends that it began using new software to prepare campaign statements immediately following the 2019-2020 cycle and has filed amendments to accurately reflect the Committee's financial activity. Further, the Committee contends that it has retained legal counsel to provide advice and guidance to the Treasurer and implemented procedures to ensure the financial accuracy of reports.

Excessive Contributions

5. During the 2020 election cycle, an authorized committee could not accept more than \$2,800 per election from individuals. 52 U.S.C. § 30116(a)(1)(A), (f); 11 C.F.R. §§ 110.1(a)-(b), 110.9; *see* Price Index Adjustments for Contribution and Expenditure

Limitations and Lobbyist Bundling Disclosure Threshold, 84 Fed. Reg. 2504, 2506 (Feb. 7, 2019) (providing notice of adjustment to contribution limits).

6. Contributions which either exceed the contribution limit on their face or in the aggregate may be deposited or returned to the contributor. 11 C.F.R. § 103.3(b)(3). If the excessive contribution is accepted, the treasurer may request redesignation or reattribution of the contribution. *Id.* If a redesignation or reattribution is not obtained, the treasurer must refund the contribution to the contributor within 60 days of receipt. *Id.*

7. During the 2019 and 2020 calendar years, the Committee accepted excessive contributions from seven individuals totaling \$19,000 that were not refunded, reattributed, or redesignated within the permissible timeframe. The Committee did untimely refund or disgorge the excessive contributions.

#### Excessive Cash Disbursements

8. A committee shall make all disbursements by check or similar draft drawn on an account at its designated campaign depository, except for expenditures of \$100 or less made from a petty cash fund. 52 U.S.C. § 30102(h)(2); 11 C.F.R. § 102.11.

9. During the 2020 calendar year, the Committee made four prohibited cash disbursements that were each in excess of \$100, totaling \$7,000.

10. The Committee contends that it retained legal counsel to provide advice and guidance to the Treasurer and implemented procedures to ensure the disbursements comply with the requirements of the Act.

V. Respondents committed the following violations:

1. Respondent violated 52 U.S.C. § 30104(b)(1)-(5) and 11 C.F.R. § 104.3(a), (b) by failing to accurately report receipts and disbursements in calendar year 2020.

2. Respondent violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by knowingly accepting excessive contributions.

3. Respondent violated 52 U.S.C. § 30102(h)(2) and 11 C.F.R. § 102.11 by making prohibited cash disbursements.

VI. Respondent will take the following actions:

1. Respondent will pay a civil penalty to the Commission in the amount of Sixty-Eight Thousand Dollars (\$68,000), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Respondent will cease and desist from committing violations of 52 U.S.C. §§ 30104(b)(1)-(5), 30116(f), and 30102(h)(2) and 11 C.F.R. §§ 104.3(a), (b), 110.9, and 102.11.

3. The Committee will send its treasurer to a Commission-sponsored training program for political committees within one year of the effective date of this Agreement.

Respondent shall submit evidence of the required registration and attendance at such event to the Commission.

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

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

IX. Respondent shall have no more than 30 days from the date this Agreement becomes effective to comply with and implement the requirements contained in this Agreement and to so notify the Commission.

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

FOR THE COMMISSION:

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

Digitally signed by Lisa  
 Jane Stevenson  
 Date: 2025.05.27 10:13:04  
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\_\_\_\_\_  
 Date

FOR THE RESPONDENT:



\_\_\_\_\_  
 David Gould  
 Treasurer

04 / 01 / 2025

\_\_\_\_\_  
 Date