



250 Massachusetts Ave NW, Suite 400 | Washington, DC 20001

August 2, 2024

**VIA ELECTRONIC MAIL**

Wanda D. Brown  
Assistant General Counsel,  
Complaints Examination & Legal Administration  
Federal Election Commission  
1050 First Street, N.E.  
Washington, D.C. 20463  
[cela@fec.gov](mailto:cela@fec.gov)

**Re: Black Voters Matter Action PAC (C00753277), RAD Referral 24L-21**

Dear Ms. Brown:

We are writing in response to the Federal Election Commission's (the "FEC" or "Commission") letter dated June 27, 2024, regarding Black Voters Matter Action PAC's (the "Committee"), late filing of two independent expenditure reports.

In the 2021-2022 election cycle, the Committee timely disclosed over \$1.5 million in independent expenditures. However, due to inadvertent lapses in its internal compliance procedures, the Committee failed to timely disclose three independent expenditures totaling \$158,018.00, each related to the runoff election for U.S. Senate in Georgia on December 6, 2022. The Committee has since put in place procedures to reduce the chance of future lapses that affect independent expenditure disclosure.

The Committee takes its disclosure obligations seriously and has disclosed the vast majority of its activity on a timely basis. The Committee seeks to cooperate with the Commission to resolve this matter and requests to continue resolution through the Alternative Dispute Resolution program.

Please let us know if you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jon S. Berkon".

JONATHAN S. BERKON  
SARAH N. MAHMOOD

Counsel to Black Voters Matter Action PAC and  
Kamau Franklin, in his official capacity as Treasurer



**FEDERAL ELECTION COMMISSION**  
**1050 First Street, NE**  
**Washington, DC**

**STATEMENT OF DESIGNATION OF COUNSEL**

Provide one form for each Respondent/Witness

**EMAIL cela@fec.gov**

**AR/MUR/RR/P-MUR# 24L-21**

Name of Counsel: Jonathan S. Berkon; Sarah N. Mahmood

Firm: Elias Law Group LLP

Address: 250 Mass. Ave NW, Suite 400

Washington, DC 20001

Office#: 202-968-4511

Fax#: \_\_\_\_\_

Mobile#: \_\_\_\_\_

E-mail: JBerkon@elias.law; SMahmood@elias.law

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

7/23/24  
 Date

Kamau Franklin  
 (Signature - Respondent/Agent/Treasurer)

Treasurer

Title

Kamau Franklin

(Name - Please Print)

Black Voters Matter Action PAC; Kamau Franklin, Treasurer

**RESPONDENT:**

(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 3645 Marketplace Blvd, Suite 130-232  
 (Please Print)

Atlanta, GA 30344

Home#: \_\_\_\_\_

Mobile#: \_\_\_\_\_

Office#: \_\_\_\_\_

Fax#: \_\_\_\_\_

E-mail: \_\_\_\_\_

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.