





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2014 APR -1 PM 4: 32

April 1, 2014

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser/Sari Pickeral *KDR dp*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation –2013 Year-End Report for the  
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2013 Year-End Report in accordance with 2 U.S.C. 434(a). The Year-End Report was due on January 31, 2014.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report : no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

**Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

Federal Election Commission  
Reason to Believe Circulation Report  
2013 YEAR-END Not Election Sensitive 01/31/2014 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2773	C00540385	BEALE FOR CONGRESS	BEALE, ANTHONY A	STEVEN R. BURRIS	\$369,434	2		Not Filed	\$92,359 (est)	\$5,775
2774	C00411173	COMMERCIAL REAL ESTATE FINANCE COUNCIL PAC		STEPHEN RENNA	\$124,627	0	2/7/2014	7	\$36,645	\$340
2775	C00553164	DAVID M ALAMEEL FOR UNITED STATES SENATE	ALAMEEL, DAVID M	DAVID PULLING	\$1,257,586	0	2/6/2014	6	\$1,257,586	\$6,700
2776	C00507780	FLEMMING FOR CONGRESS	FLEMMING, STANLEY L K	MARTHA ET AL FLEMMING	\$135,174	0	3/18/2014	Not Filed	\$5,050	\$330
2778	C00224790	GRAYROBINSON, P.A., POLITICAL ACTION COMMITTEE		J. CHARLES GRAY	\$101,815	0		Not Filed	\$101,815 (est)	\$4,950
2779	C00505800	JILL STEIN FOR PRESIDENT	STEIN, JILL	JAMES MORAN	\$218,403	1		Not Filed	\$19,855 (est)	\$687
2780	C00550780	JIM RUBENS FOR US SENATE	RUBENS, JIM	JEFF POSTUPACK	\$320,860	0	2/18/2014	18	\$43,314	\$560
2781	C00547232	JOE PALUMBO FOR CONGRESS	PALUMBO, JOSEPH E	KEITH RICHMOND	\$182,849	0		Not Filed	\$182,849 (est)	\$6,050
2783	C00009845	MONTGOMERY COUNTY DEMOCRATIC CENTRAL COMMITTEE		PAMELA E. QUEEN	\$265,722	0		Not Filed	\$184,557 (est)	\$6,050
2784	C00518027	STEVE SALAZAR FOR CONGRESS	SALAZAR, STEVE	ROSARIO RODRIGUEZ	\$110,712	3		Not Filed	\$110,712 (est)	\$8,662
2785	C00546747	WELLS GRIFFITH FOR CONGRESS	GRIFFITH, PRESTON WELLS III	RICHARD BYRON WILLIAMS	\$394,486	0		Not Filed	\$197,243 (est)	\$6,050

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation - 2013 )  
Year-End Report for the Administrative )  
Fine Program: )  
BEALE FOR CONGRESS, and STEVEN R ) AF# 2773  
BURRIS as treasurer; )  
COMMERCIAL REAL ESTATE ) AF# 2774  
FINANCE COUNCIL PAC, and RENNA, )  
STEPHEN as treasurer; )  
DAVID M ALAMEEL FOR UNITED ) AF# 2775  
STATES SENATE, and DAVID PULLING )  
as treasurer; )  
FLEMMING FOR CONGRESS, and ) AF# 2776  
MARTHA FLEMMING as treasurer; )  
  
GRAYROBINSON, P.A., POLITICAL ) AF# 2778  
ACTION COMMITTEE, and GRAY, J. )  
CHARLES as treasurer; )  
JILL STEIN FOR PRESIDENT, and ) AF# 2779  
MORAN, JAMES as treasurer; )  
JIM RUBENS FOR US SENATE, and ) AF# 2780  
JEFF POSTUPACK as treasurer; )  
JOE PALUMBO FOR CONGRESS, and ) AF# 2781  
KEITH BUCKHOUT as treasurer; )  
  
MONTGOMERY COUNTY ) AF# 2783  
DEMOCRATIC CENTRAL )  
COMMITTEE, and QUEEN, PAMELA E )  
as treasurer; )  
STEVE SALAZAR FOR CONGRESS, and ) AF# 2784  
ROSARIO RODRIGUEZ as treasurer; )  
WELLS GRIFFITH FOR CONGRESS, and ) AF# 2785  
RICHARD BYRON WILLIAMS as )  
treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 03, 2014 the Commission took the following actions on the Reason To Believe Recommendation - 2013 Year-End Report for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated April 01, 2014, on the following committees:

AF#2773 Decided by a vote of 6-0 to: (1) find reason to believe that BEALE FOR CONGRESS, and STEVEN R BURRIS as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2774 Decided by a vote of 6-0 to: (1) find reason to believe that COMMERCIAL REAL ESTATE FINANCE COUNCIL PAC, and RENNA, STEPHEN as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2775 Decided by a vote of 6-0 to: (1) find reason to believe that DAVID M ALAMEEL FOR UNITED STATES SENATE, and DAVID PULLING as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2776 Decided by a vote of 6-0 to: (1) find reason to believe that FLEMMING FOR CONGRESS, and MARTHA FLEMMING as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2778 Decided by a vote of 6-0 to: (1) find reason to believe that GRAYROBINSON, P.A., POLITICAL ACTION COMMITTEE, and GRAY, J. CHARLES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2779 Decided by a vote of 6-0 to: (1) find reason to believe that JILL STEIN FOR PRESIDENT, and MORAN, JAMES as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2780 Decided by a vote of 6-0 to: (1) find reason to believe that JIM RUBENS FOR US SENATE, and JEFF POSTUPACK as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2781 Decided by a vote of 6-0 to: (1) find reason to believe that JOE PALUMBO FOR CONGRESS, and KEITH BUCKHOUT as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2783 Decided by a vote of 6-0 to: (1) find reason to believe that MONTGOMERY COUNTY DEMOCRATIC CENTRAL COMMITTEE, and QUEEN, PAMELA E as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2784 Decided by a vote of 6-0 to: (1) find reason to believe that STEVE SALAZAR FOR CONGRESS, and ROSARIO RODRIGUEZ as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 4, 2014

James Moran, in official capacity as Treasurer  
Jill Stein for President  
22 Kendall Road  
Lexington, MA 02421

C00505800  
AF#: 2779

Dear Mr. Moran:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year-End Report of Receipts and Disbursements every calendar year. This report, covering the period December 1, 2013 through December 31, 2013, was due no later than January 31, 2014. 2 U.S.C. § 434(a). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. § 434(a). 2 U.S.C. § 437g(a)(4). On April 3, 2014, the FEC found that there is reason to believe ("RTB") that Jill Stein for President and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) by failing to file timely this report on or before January 31, 2014. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$687. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55, Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$687 is due within forty (40) days of the finding, or by May 13, 2014, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$19,855  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 1

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street,

NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or May 13, 2014. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Jill Stein for President and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

**5. Settlement Offers**

If you make a payment in an amount less than the calculated civil money penalty as an offer to settle or compromise a debt owed to the Commission, the offer is herewith rejected despite any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. § 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Lee E. Goodman  
Chairman

CONFIDENTIAL

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$687 for the 2013 Year-End Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by May 13, 2014. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
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FOR: Jill Stein for President

FEC ID#: C00505800

AF#: 2779

PAYMENT DUE DATE: May 13, 2014

PAYMENT AMOUNT DUE: \$687



assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. An overview of each of these cases has been provided below.

GrayRobinson, P.A., Political Action Committee (AF 2778) filed the 2013 Year-End Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$45,630 (previously estimated to be \$101,815), thus the fine would be lowered from \$4,950 to \$1,090.

Jill Stein for President (AF 2779) filed the 2013 Year-End Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$2,089 (previously estimated to be \$19,855), thus the fine would be lowered from \$687 to \$343.

Joe Palumbo for Congress (AF 2781) filed the 2013 Year-End Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$98,411 (previously estimated to be \$182,849), thus the fine would be lowered from \$6,050 to \$3,850.

Montgomery County Democratic Central Committee (AF 2783) filed the 2013 Year-End Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$43,713 (previously estimated to be \$184,557), thus the fine would be lowered from \$6,050 to \$1,090.

Wells Griffith for Congress (AF 2785) filed the 2013 Year-End Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$22,808 (previously estimated to be \$197,243), thus the fine would be lowered from \$6,050 to \$550.

**RAD Recommendation**

- (1) Make a final determination that the political committees and their treasurers listed on the attached reports violated 2 U.S.C. § 434(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

Federal Election Commission  
 FD Circulation Report Fine Paid  
 2013 YEAR-END Not Election Sensitive 01/31/2014 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
2774	COMMERCIAL REAL ESTATE FINANCE COUNCIL PAC		C00411173	STEPHEN RENNA	02/07/2014	7	\$36,645	0	04/03/2014	\$340	\$340	05/06/2014	\$340
2775	DAVID M ALAMEEL FOR UNITED STATES SENATE	ALAMEEL, DAVID M	C00553164	DAVID PULLING	02/06/2014	6	\$1,257,586	0	04/03/2014	\$6,700	\$6,700	04/30/2014	\$6,700
2780	JIM RUBENS FOR US SENATE	RUBENS, JIM	C00550780	JEFF POSTUPACK	02/18/2014	18	\$43,314	0	04/03/2014	\$560	\$560	04/23/2014	\$560

Federal Election Commission  
 FD Circulation Report - Fine Not Paid  
 2013 YEAR-END Not Election Sensitive 01/31/2014 H\_S\_P\_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
2773	BEALE FOR CONGRESS GRAYROBINSON, P.A. POLITICAL ACTION COMMITTEE	BEALE, ANTHONY A.	C00540385	STEVEN R. BURRIS		Not Filed	\$92,359 (est)	2	04/03/2014	\$5,775	103	\$5,775
2778			C00224790	J. CHARLES GRAY	09/07/2014	Not Filed	\$45,630	0	04/03/2014	\$4,950	103	\$1,090
2779	JILL STEIN FOR PRESIDENT	STEIN, JILL	C00505800	JAMES MORAN	04/21/2014	Not Filed	\$2,089	1	04/03/2014	\$687	103	\$343
2781	JOE PALUMBO FOR CONGRESS	PALUMBO, JOSEPH E	C00547232	KEITH BUCKHOUT	06/16/2014	Not Filed	\$98,411	0	04/03/2014	\$6,050	103	\$3,850
2783	MONTGOMERY COUNTY DEMOCRATIC CENTRAL COMMITTEE		C00009845	PAMELA E. QUEEN	05/13/2014	Not Filed	\$43,713	0	04/03/2014	\$6,050	103	\$1,090
2784	STEVE SALAZAR FOR CONGRESS	SALAZAR, STEVE	C00518027	ROSARIO RODRIGUEZ		Not Filed	\$110,712 (est)	3	04/03/2014	\$8,662	103	\$8,662
2785	WELLS GRIFFITH FOR CONGRESS	GRIFFITH, PRESTON WELLS III	C00546747	RICHARD BYRON WILLIAMS	04/22/2014	Not Filed	\$22,808	0	04/03/2014	\$6,050	103	\$550



CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 17, 2014 the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation for the 2013 Year-End Report as recommended in the Reports Analysis Division's Memorandum dated July 15, 2014, on the following committees:

AF#2773 Decided by a vote of 6-0 to: (1) make a final determination that BEALE FOR CONGRESS, and STEVEN R BURRIS as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2774 Decided by a vote of 6-0 to: (1) make a final determination that COMMERCIAL REAL ESTATE FINANCE COUNCIL PAC, and RENNA, STEPHEN as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2775 Decided by a vote of 6-0 to: (1) make a final determination that DAVID M ALAMEEL FOR UNITED STATES SENATE, and DAVID PULLING as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2778 Decided by a vote of 6-0 to: (1) make a final determination that GRAYROBINSON, P.A., POLITICAL ACTION COMMITTEE, and GRAY, J. CHARLES as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2779 Decided by a vote of 6-0 to: (1) make a final determination that JILL STEIN FOR PRESIDENT, and MORAN, JAMES as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2780 Decided by a vote of 6-0 to: (1) make a final determination that JIM RUBENS FOR US SENATE, and JEFF POSTUPACK as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2781 Decided by a vote of 6-0 to: (1) make a final determination that JOE PALUMBO FOR CONGRESS, and KEITH BUCKHOUT as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2783 Decided by a vote of 6-0 to: (1) make a final determination that MONTGOMERY COUNTY DEMOCRATIC CENTRAL COMMITTEE, and QUEEN, PAMELA E as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2784 Decided by a vote of 6-0 to: (1) make a final determination that STEVE SALAZAR FOR CONGRESS, and ROSARIO RODRIGUEZ as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2785 Decided by a vote of 6-0 to: (1) make a final determination that WELLS GRIFFITH FOR CONGRESS, and RICHARD BYRON WILLIAMS as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

July 18, 2014  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 18, 2014

James Moran, in official capacity as Treasurer  
Jill Stein for President  
22 Kendall Road  
Lexington, MA 02421

C00505800  
AF#: 2779

Dear Mr. Moran:

On April 3, 2014, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Jill Stein for President and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) for filing late or failing to file the 2013 Year-End Report. By letter dated April 4, 2014, the Commission notified you of the RTB finding and the preliminary civil money penalty calculated at the RTB stage to be \$687 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, you were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. Since that time, the amount of the civil money penalty has been changed to reflect the actual level of activity of the 2013 Year-End Report. The FEC made a final determination on July 17, 2014 that Jill Stein for President and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) and assessed a civil money penalty in the amount of \$343 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$2,089

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purposes of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 1

At this juncture, the following courses of action are available to you:

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within thirty (30) days of receipt of this letter, to the district court of the United States for the

district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 2 U.S.C. § 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 2 U.S.C. § 437g. 11 CFR § 111.38.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within thirty (30) days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within five (5) days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

## **3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, send the enclosed remittance form, along with your payment, to the address on page 4 within thirty (30) days of receipt of this letter.

## **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### **4. Partial Payments**

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

### **5. Settlement Offers**

If you make a payment in an amount less than the civil money penalty as an offer to settle or compromise a debt owed to the Commission, the offer is herewith rejected despite any restrictive endorsements contained on your check or money order or proposed in correspondence

transmitted with your check or money order. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 CFR § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Sari Pickerall at Federal Election Commission, 999 E St., NW, Washington, DC 20463, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in black ink, appearing to read "Lee E. Goodman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lee E. Goodman  
Chairman

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**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$343 for the 2013 Year-End Report.

This penalty should be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
PO Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The form and payment are due within thirty (30) days of receipt of this letter.

**Payments by Personal Check**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

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FOR: Jill Stein for President

FEC ID#: C00505800

AF#: 2779

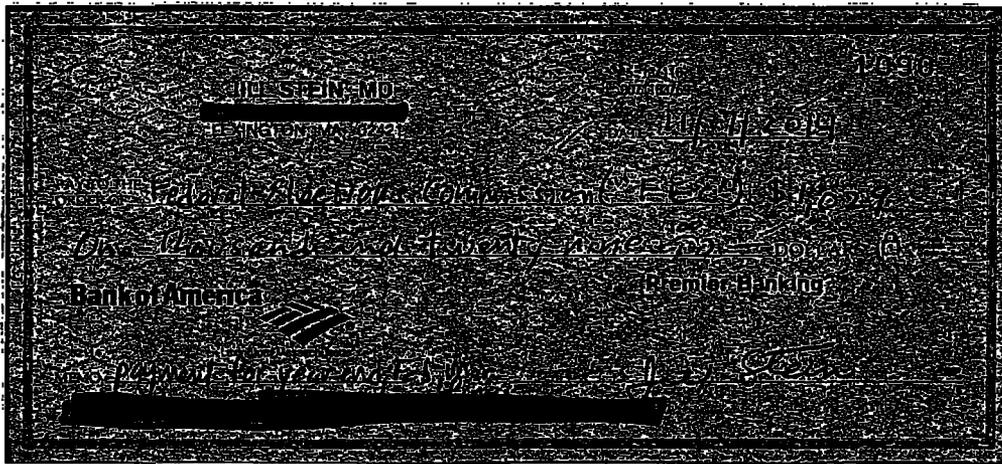
PAYMENT AMOUNT DUE: \$343

Payment for end of year, Feb.  
and march fines.

Thank-you.  
Jill Stein

FEDERAL ELECTION COMMISSION

Lockbox: GLX-979058 Ledger Date 11/10/2014



Batch	Item	TID	Batch Total	Amount
1	2	Y-5222855	\$1,054.00	\$1,029.00

11/10/2014 11:00:00 AM

**usbank.**

St. Louis GA Lockbox  
(314) 425-1818

11/10/2014 11:00:00 AM

