

FEDERAL ELECTION COMMISSION
FIRST GENERAL COUNSEL’S REPORT

AR 23-02

DATE REFERRED: Mar. 9, 2023
DATE OF NOTIFICATION: Mar. 10, 2023
DATE OF RESPONSE: Mar. 21, 2023
DATE ACTIVATED: June 1, 2023

ELECTION CYCLE: 2020
EXPIRATION OF SOL: Apr. 28, 2024 (earliest)
Jan. 31, 2026 (latest)

SOURCE: Audit Referral

RESPONDENT: Sheila Jackson Lee for Congress and
Karen Y. Grays in her official capacity as treasurer

**RELEVANT STATUTES
AND REGULATIONS:**

52 U.S.C. § 30104(b)
52 U.S.C. § 30116(f)
52 U.S.C. § 30118(a)
11 C.F.R. § 104.3
11 C.F.R. § 110.9
11 C.F.R. § 114.2

INTERNAL REPORTS CHECKED: Disclosure Reports
Audit Reports

FEDERAL AGENCIES CHECKED: None

I. INTRODUCTION

This matter arises from an audit of the 2019-2020 election cycle activity of Sheila Jackson Lee for Congress and Karen Y. Grays in her official capacity as treasurer (the “Committee”). On March 9, 2023, the Audit Division referred the Committee to the Office of General Counsel (“OGC”) for misstating its 2020 calendar year receipts; receiving excessive contributions in 2019 and 2020; and receiving prohibited corporate contributions in 2019 and 2020, in violation of the Federal Election Campaign Act of 1971, as amended (the “Act”). The Committee acknowledges both the misreporting and acceptance of excessive and prohibited

1 corporate contributions but asserts that it has materially corrected the relevant reports, refunded
2 the excessive and prohibited contributions, and spent considerable resources to improve its
3 compliance procedures.

4 For the reasons set forth below, we recommend that the Commission: (1) open a Matter
5 Under Review (“MUR”); (2) find reason to believe that the Committee violated 52 U.S.C.
6 § 30104(b) and 11 C.F.R. § 104.3 by misstating its receipts; (3) find reason to believe that the
7 Committee violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by knowingly accepting
8 excessive contributions; (4) find reason to believe that the Committee violated 52 U.S.C.
9 § 30118(a) and 11 C.F.R. § 114.2 by knowingly accepting prohibited corporate contributions;
10 and (5) authorize pre-probable cause conciliation with the Committee.

11 **II. FACTUAL BACKGROUND**

12 The Committee is the principal campaign committee of U.S. Representative Sheila
13 Jackson Lee; Karen Y. Grays is its treasurer.¹

14 On April 28, 2021, the Audit Division notified the Committee that it would be the subject
15 of a Commission audit of its 2019-2020 election cycle activity.² On January 18, 2023, the
16 Commission approved the Audit Division’s Recommendation Memorandum.³ On March 6,
17 2023, the Commission approved an edited Proposed Final Audit Report.⁴ The Commission-
18 approved Final Audit Report found that the Committee misstated its financial activity, received

¹ Sheila Jackson Lee for Congress, Statement of Organization (Oct. 2, 2018), <https://docquery.fec.gov/pdf/296/201810029124272296/201810029124272296.pdf>.

² Letter from Dayna C. Brown, Acting Assistant Staff Director Audit Division, FEC, to Karen Y. Grays, Treasurer, Sheila Jackson Lee for Congress (Apr. 28, 2021) (“Audit Notification”).

³ Certification (“Cert.”) (Jan. 18, 2023), A21-05 (Sheila Jackson Lee for Congress).

⁴ Cert. (Mar. 6, 2023), A21-05 (Sheila Jackson Lee for Congress) (approving Proposed Final Audit Report for the Committee, subject to edits circulated by Commissioner Cooksey’s office).

1 excessive contributions totaling \$129,600, and received prohibited corporate contributions
 2 totaling \$10,450.⁵ The Final Audit Report noted that the Committee untimely resolved \$87,600
 3 of the excessive contributions by providing redesignation and reattribution letters, and that in
 4 response to the Audit Division's Draft Final Audit Report, had provided a list of refund checks
 5 untimely issued for the remaining \$42,000 of excessive contributions and remaining \$10,450 of
 6 prohibited contributions.⁶

7 Pursuant to the 2019-2020 Cycle Materiality Thresholds, the Audit Division referred the
 8 Committee to OGC.⁷ Specifically, the Audit Division referred the Committee for underreporting
 9 its receipts in calendar year 2020 by \$120,605,⁸ for receiving a total of \$129,600 in excessive

⁵ Final Audit Report of the Commission on Sheila Jackson Lee for Congress (January 1, 2019 – December 31, 2020), https://www.fec.gov/resources/cms-content/documents/SheilaJacksonLee_FARC_2020.pdf (“Final Audit Report”).

⁶ *Id.* at 8, 12-13, 16-17.

⁷ Audit Referral AR 23-02 (Mar. 9, 2023) (Sheila Jackson Lee for Congress).

⁸ The Final Audit Report's finding that the Committee underreported its receipts for calendar year 2020 by \$120,605 is based on the Audit Division's use of the Committee's most recent amendments prior to the Audit Notification, which took place on February 15, 2021, and the Committee's most recent amendments to-date, which occurred on July 26, 2022. Audit Division 2019-2020 Cycle Materiality Thresholds, Authorized Committees at 29 (for a misstatement of financial activity, Audit looks to the “most recently filed reports as of the date of the Audit Notification Letter (receipts, disbursements, and cash on hand) and the correct reportable activity according to the bank reconciliation”). Had the Audit Division calculated the Committee's reporting errors by using the Committee's original reports and its most recent amendments to-date, it would have shown that the Committee *overreported* its 2020 receipts by \$4,870,922, most of which was the result of an incorrect \$5,000,000 contribution reported on the Committee's original 2020 Pre-General Report that was later amended to reflect a \$5,000 PAC contribution. *Compare* Sheila Jackson Lee for Congress, 2020 Pre-General Report at 5 (Oct. 22, 2020), <https://docquery.fec.gov/pdf/813/202010229336305813/202010229336305813.pdf>, with Sheila Jackson Lee for Congress, Amended 2020 Pre-General Report at 5 (Dec. 13, 2020), <https://docquery.fec.gov/pdf/964/202012139374346964/202012139374346964.pdf>. Compare the two charts below:

Sheila Jackson Lee for Congress – Reported Receipts				
Monthly Report	Amended Filing (Feb. 15, 2021)	Latest Amended Filing (July 26, 2022)	Difference	Over or Under Reporting
2020 Pre-Primary	\$ 40,650.00	\$ 42,028.45	\$ 1,378.45	\$ (1,378.45)
2020 April Quarterly	\$ 184,822.97	\$ 206,889.77	\$ 22,066.80	\$ (22,066.80)
2020 July Quarterly	\$ 34,285.00	\$ 42,391.32	\$ 8,106.32	\$ (8,106.32)

- 1 contributions during the 2019-2020 election cycle, and for receiving a total of \$10,450 in
 2 prohibited corporate contributions during the 2019-2020 election cycle.⁹ On March 10, 2023,
 3 OGC notified the Committee of the Referral and that it was subject to possible enforcement
 4 action.¹⁰

2020 Oct. Quarterly	\$ 143,886.89	\$ 167,381.28	\$ 23,494.39	\$ (23,494.39)
2020 Pre-General	\$ 7,760.00	\$ 5,405.00	\$ 2,355.00	\$ (2,355.00)
2020 Post General	\$ 113,386.80	\$ 181,342.47	\$ 67,955.67	\$ (67,955.67)
2020 Year End	\$ 480.25	\$ 763.47	\$ 283.22	\$ (283.22)
2020 Total	\$ 525,271.91	\$ 646,201.76	\$ 120,929.85	\$ (120,929.85)

Sheila Jackson Lee for Congress – Reported Receipts				
Monthly Report	Original Report	Latest Amended Filing (July 26, 2022)	Difference	Over or Under Reporting
2020 Pre-Primary	\$ 40,650.00	\$ 42,028.45	\$ 1,378.45	\$ (1,378.45)
2020 April Quarterly	\$ 185,139.35	\$ 206,889.77	\$ 21,750.42	\$ (21,750.42)
2020 July Quarterly	\$ 32,785.00	\$ 42,391.32	\$ 9,606.32	\$ (9,606.32)
2020 Oct. Quarterly	\$ 143,886.89	\$ 167,381.28	\$ 23,494.39	\$ (23,494.39)
2020 Pre-General	\$ 5,002,760.00	\$ 5,405.00	\$ 4,997,355.00	\$ 4,997,355.00
2020 Post General	\$ 111,422.27	\$ 181,342.47	\$ 69,920.20	\$ (69,920.20)
2020 Year End	\$ 480.25	\$ 763.47	\$ 283.22	\$ (283.22)
2020 Total	\$ 5,517,123.76	\$ 646,201.76	\$ 4,870,922.00	\$ 4,870,922.00

The single misreported entry totaling \$5,000,000 on the Committee's original 2020 Pre-General Report was not referred by RAD because in response to the Commission's November 22, 2020 Request for Additional Information, the Committee subsequently amended the amount to \$5,000 and included a memo entry that the previously reported amount was incorrect. Sheila Jackson Lee for Congress, Amended 2020 Pre-General Report at 5 (Feb. 15, 2021), <https://docquery.fec.gov/pdf/400/202102159427792400/202102159427792400.pdf>.

⁹ See Referral at 1-2.

¹⁰ Notification Letter from Charles Kitcher, Associate General Counsel for Enforcement, FEC, to Neil P. Reiff and Joseph E. Sandler, Sandler Reiff Lamb & Birkenstock, P.C. (Mar. 10, 2023).

1 The Committee's Response "acknowledges that its previous compliance challenges lead
2 to errors in disclosure and the acceptance of both excessive and prohibited contributions."¹¹ The
3 Committee attributes the errors to the fact that its 2020 compliance operations were handled by a
4 part-time treasurer.¹² The Committee states that it has since transferred its compliance
5 operations to an outside firm, amended its disclosure reports, and refunded all excessive and
6 prohibited contributions.¹³

7 **III. LEGAL ANALYSIS**

8 The Act requires committee treasurers to file reports in accordance with the provisions of
9 52 U.S.C. § 30104(a), (b).¹⁴ These reports must be timely and must include, *inter alia*, the total
10 amount of receipts, including the appropriate itemizations, where required.¹⁵ The Commission's
11 Final Audit Report found, and the Response acknowledges, that the Committee underreported its
12 receipts for calendar year 2020 by \$120,605.¹⁶ Accordingly, the available information indicates
13 that the Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3 by misstating its
14 receipts in calendar year 2020.

15 The Act limits the amount an individual may contribute to a candidate's authorized
16 committee per election, and likewise, the Act prohibits any candidate or committee from
17 knowingly accepting an excessive contribution.¹⁷ The Act also prohibits corporations from
18 making contributions to federal candidates or their committees and corporate officers and

¹¹ Resp. at 1 (Mar. 21, 2023).

¹² *Id.*

¹³ *Id.*

¹⁴ 52 U.S.C. § 30104(a)(1), (b); *see also* 11 C.F.R. § 104.1(a).

¹⁵ 52 U.S.C. § 30104(b); 11 C.F.R. § 104.3.

¹⁶ Final Audit Report at 5-8.

¹⁷ 52 U.S.C. § 30116(a)(1)(A), (f).

1 directors from consenting to such contributions.¹⁸ It also prohibits federal candidates or their
2 committees from knowingly accepting corporate contributions.¹⁹

3 A committee's treasurer is responsible for examining all contributions received for
4 evidence of illegality and for ascertaining whether contributions received, when aggregated with
5 other contributions from the same contributor, exceed the Act's contribution limits.²⁰ Treasurers
6 must make their best efforts to determine the legality of the contribution.²¹ If the legality of the
7 contribution cannot be determined, the treasurer must refund the contribution within 30 days of
8 receipt.²² Contributions which on their face exceed the contribution limits, and contributions
9 which do not appear to exceed the contribution limits but exceed contribution limits when
10 aggregated with other contributions, and which cannot be accepted under the net debts
11 outstanding provisions, may be returned to the contributor or deposited.²³ If deposited,
12 contributions must be: (1) redesignated in accordance with 11 C.F.R. §§ 110.1(b)(5) or
13 110.2(b)(5); (2) reattributed in accordance with 11 C.F.R. § 110.1(k)(3); or (3) refunded within
14 60 days of the date that the committee has actual notice of the need to refund, redesignate or
15 reattribute the contributions.²⁴

¹⁸ *Id.* § 30118(a).

¹⁹ *Id.*

²⁰ 11 C.F.R. § 103.3(b).

²¹ *Id.* § 103.3(b)(1).

²² *Id.*

²³ *Id.* § 103.3(b)(3); *see also id.* § 110.1(b)(3) (a contribution designated for a particular election shall not exceed the amount of net debts outstanding from that election).

²⁴ *Id.* § 103.3(b)(3).

1 During the 2019-2020 election cycle, the Act and Commission regulations limited an
2 authorized committee to accepting a total of \$2,800 per election from any individual.²⁵ The
3 Commission's Final Audit Report found, and the Response acknowledges, that the Committee
4 accepted excessive contributions totaling \$129,600 during the 2019-2020 election cycle.²⁶ The
5 Committee did not refund these contributions within 60 days.²⁷ Accordingly, the available
6 information indicates that the Committee violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by
7 knowingly accepting excessive contributions.

8 The Commission's Final Audit Report found, and the Response acknowledges, that the
9 Committee accepted prohibited corporate contributions totaling \$10,450 during the 2019-2020
10 election cycle.²⁸ The Committee did not refund these contributions within 30 days.²⁹ Thus,
11 available information indicates that the Committee violated 52 U.S.C. § 30118(a) and 11 C.F.R.
12 § 114.2 by knowingly accepting prohibited corporate contributions.

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²⁵ 52 U.S.C. § 30116(a)(1)(A); 11 C.F.R. § 110.1(b); Price Index Adjustments for Contribution and Expenditure Limitations and Lobbyist Bundling Disclosure Threshold, 84 Fed. Reg. 2504, 2506 (Feb. 7, 2019) ("Price Index Adjustments").

²⁶ Final Audit Report at 8-13.

²⁷ According to the Audit Division's records, the Committee received the last of the excessive contributions on November 13, 2020, and did not begin to refund these contributions until July 26, 2022.

²⁸ Final Audit Report at 13-17.

²⁹ According to the Audit Division's records, the Committee received the last of the prohibited contributions on October 23, 2020, and did not begin to refund these contributions until July 25, 2022.

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Because the 2019-2020 Cycle Audit Materiality Thresholds reflect activity that, in the Commission's judgment, warrants enforcement action, and because there is no factual dispute regarding the activity as set forth in the Commission's Final Audit Report, we recommend that the Commission open a MUR and find reason to believe that the Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3 by misstating its receipts in calendar year 2020. We also recommend that the Commission find reason to believe that the Committee violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by knowingly accepting excessive contributions. We further recommend that the Commission find reason to believe that the Committee violated 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2 by knowingly accepting prohibited corporate contributions.

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10 **V. RECOMMENDATIONS**

- 11 1. Open a MUR;
- 12 2. Find reason to believe that Sheila Jackson Lee for Congress and Karen Y. Grays
13 in her official capacity as treasurer violated 52 U.S.C. § 30104(b) and 11 C.F.R.
14 § 104.3 by misstating \$120,605 in receipts in calendar year 2020;

FEDERAL ELECTION COMMISSION**FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: Sheila Jackson Lee for Congress and **MUR: 8213**
Karen Y. Grays in her official capacity
as treasurer

I. INTRODUCTION

This matter arises from an audit of the 2019-2020 election cycle activity of Sheila Jackson Lee for Congress and Karen Y. Grays in her official capacity as treasurer (the “Committee”). On March 9, 2023, the Audit Division referred the Committee to the Office of General Counsel (“OGC”) for misstating its 2020 calendar year receipts; receiving excessive contributions in 2019 and 2020; and receiving prohibited corporate contributions in 2019 and 2020, in violation of the Federal Election Campaign Act of 1971, as amended (the “Act”). The Committee acknowledges both the misreporting and acceptance of excessive and prohibited corporate contributions but asserts that it has materially corrected the relevant reports, refunded the excessive and prohibited contributions, and spent considerable resources to improve its compliance procedures.

For the reasons set forth below, the Commission finds reason to believe that the Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3 by misstating its receipts, that the Committee violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by knowingly accepting excessive contributions, and that the Committee violated 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2 by knowingly accepting prohibited corporate contributions.

1 II. FACTUAL BACKGROUND

2 The Committee is the principal campaign committee of U.S. Representative Sheila
3 Jackson Lee; Karen Y. Grays is its treasurer.¹

4 On April 28, 2021, the Audit Division notified the Committee that it would be the subject
5 of a Commission audit of its 2019-2020 election cycle activity.² On January 18, 2023, the
6 Commission approved the Audit Division's Recommendation Memorandum.³ On March 6,
7 2023, the Commission approved an edited Proposed Final Audit Report.⁴ The Commission-
8 approved Final Audit Report found that the Committee misstated its financial activity, received
9 excessive contributions totaling \$129,600, and received prohibited corporate contributions
10 totaling \$10,450.⁵ The Final Audit Report noted that the Committee untimely resolved \$87,600
11 of the excessive contributions by providing redesignation and reattribution letters, and that in
12 response to the Audit Division's Draft Final Audit Report, had provided a list of refund checks
13 untimely issued for the remaining \$42,000 of excessive contributions and remaining \$10,450 of
14 prohibited contributions.⁶

15 Pursuant to the 2019-2020 Cycle Materiality Thresholds, the Audit Division referred the
16 Committee to OGC.⁷ Specifically, the Audit Division referred the Committee for underreporting

¹ Sheila Jackson Lee for Congress, Statement of Organization (Oct. 2, 2018), <https://docquery.fec.gov/pdf/296/201810029124272296/201810029124272296.pdf>.

² Letter from Dayna C. Brown, Acting Assistant Staff Director Audit Division, FEC, to Karen Y. Grays, Treasurer, Sheila Jackson Lee for Congress (Apr. 28, 2021) ("Audit Notification").

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⁵ Final Audit Report of the Commission on Sheila Jackson Lee for Congress (January 1, 2019 – December 31, 2020), https://www.fec.gov/resources/cms-content/documents/SheilaJacksonLee_FARC_2020.pdf ("Final Audit Report").

⁶ *Id.* at 8, 12-13, 16-17.

⁷ Audit Referral AR 23-02 (Mar. 9, 2023) (Sheila Jackson Lee for Congress).

1 its receipts in calendar year 2020 by \$120,605, for receiving a total of \$129,600 in excessive
2 contributions during the 2019-2020 election cycle, and for receiving a total of \$10,450 in
3 prohibited corporate contributions during the 2019-2020 election cycle.⁸ On March 10, 2023,
4 OGC notified the Committee of the Referral and that it was subject to possible enforcement
5 action.⁹

6 The Committee’s Response “acknowledges that its previous compliance challenges lead
7 to errors in disclosure and the acceptance of both excessive and prohibited contributions.”¹⁰ The
8 Committee attributes the errors to the fact that its 2020 compliance operations were handled by a
9 part-time treasurer.¹¹ The Committee states that it has since transferred its compliance
10 operations to an outside firm, amended its disclosure reports, and refunded all excessive and
11 prohibited contributions.¹²

12 **III. LEGAL ANALYSIS**

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14 52 U.S.C. § 30104(a), (b).¹³ These reports must be timely and must include, *inter alia*, the total
15 amount of receipts, including the appropriate itemizations, where required.¹⁴ The Commission’s
16 Final Audit Report found, and the Response acknowledges, that the Committee underreported its
17 receipts for calendar year 2020 by \$120,605.¹⁵ Accordingly, the available information indicates

⁸ See Referral at 1-2.

⁹ Notification Letter from Charles Kitcher, Associate General Counsel for Enforcement, FEC, to Neil P. Reiff and Joseph E. Sandler, Sandler Reiff Lamb & Birkenstock, P.C. (Mar. 10, 2023).

¹⁰ Resp. at 1 (Mar. 21, 2023).

¹¹ *Id.*

¹² *Id.*

¹³ 52 U.S.C. § 30104(a)(1), (b); *see also* 11 C.F.R. § 104.1(a).

¹⁴ 52 U.S.C. § 30104(b); 11 C.F.R. § 104.3.

¹⁵ Final Audit Report at 5-8.

1 that the Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3 by misstating its
2 receipts in calendar year 2020.

3 The Act limits the amount an individual may contribute to a candidate's authorized
4 committee per election, and likewise, the Act prohibits any candidate or committee from
5 knowingly accepting an excessive contribution.¹⁶ The Act also prohibits corporations from
6 making contributions to federal candidates or their committees and corporate officers and
7 directors from consenting to such contributions.¹⁷ It also prohibits federal candidates or their
8 committees from knowingly accepting corporate contributions.¹⁸

9 A committee's treasurer is responsible for examining all contributions received for
10 evidence of illegality and for ascertaining whether contributions received, when aggregated with
11 other contributions from the same contributor, exceed the Act's contribution limits.¹⁹ Treasurers
12 must make their best efforts to determine the legality of the contribution.²⁰ If the legality of the
13 contribution cannot be determined, the treasurer must refund the contribution within 30 days of
14 receipt.²¹ Contributions which on their face exceed the contribution limits, and contributions
15 which do not appear to exceed the contribution limits but exceed contribution limits when
16 aggregated with other contributions, and which cannot be accepted under the net debts
17 outstanding provisions, may be returned to the contributor or deposited.²² If deposited,

¹⁶ 52 U.S.C. § 30116(a)(1)(A), (f).

¹⁷ *Id.* § 30118(a).

¹⁸ *Id.*

¹⁹ 11 C.F.R. § 103.3(b).

²⁰ *Id.* § 103.3(b)(1).

²¹ *Id.*

²² *Id.* § 103.3(b)(3); *see also id.* § 110.1(b)(3) (a contribution designated for a particular election shall not exceed the amount of net debts outstanding from that election).

1 contributions must be: (1) redesignated in accordance with 11 C.F.R. §§ 110.1(b)(5) or
2 110.2(b)(5); (2) reattributed in accordance with 11 C.F.R. § 110.1(k)(3); or (3) refunded within
3 60 days of the date that the committee has actual notice of the need to refund, redesignate or
4 reattribute the contributions.²³

5 During the 2019-2020 election cycle, the Act and Commission regulations limited an
6 authorized committee to accepting a total of \$2,800 per election from any individual.²⁴ The
7 Commission’s Final Audit Report found, and the Response acknowledges, that the Committee
8 accepted excessive contributions totaling \$129,600 during the 2019-2020 election cycle.²⁵ The
9 Committee did not refund these contributions within 60 days. Accordingly, the available
10 information indicates that the Committee violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by
11 knowingly accepting excessive contributions.

12 The Commission’s Final Audit Report found, and the Response acknowledges, that the
13 Committee accepted prohibited corporate contributions totaling \$10,450 during the 2019-2020
14 election cycle.²⁶ The Committee did not refund these contributions within 30 days. Thus,
15 available information indicates that the Committee violated 52 U.S.C. § 30118(a) and 11 C.F.R.
16 § 114.2 by knowingly accepting prohibited corporate contributions.

17 Because the 2019-2020 Cycle Audit Materiality Thresholds reflect activity that, in the
18 Commission’s judgment, warrants enforcement action, and because there is no factual dispute
19 regarding the activity as set forth in the Commission’s Final Audit Report, the Commission finds

²³ *Id.* § 103.3(b)(3).

²⁴ 52 U.S.C. § 30116(a)(1)(A); 11 C.F.R. § 110.1(b); Price Index Adjustments for Contribution and Expenditure Limitations and Lobbyist Bundling Disclosure Threshold, 84 Fed. Reg. 2504, 2506 (Feb. 7, 2019) (“Price Index Adjustments”).

²⁵ Final Audit Report at 8-13.

²⁶ *Id.* at 13-17.

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Factual and Legal Analysis

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1 reason to believe that the Committee violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3 by
2 misstating its receipts in calendar year 2020. The Commission also finds reason to believe that
3 the Committee violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by knowingly accepting
4 excessive contributions. Finally, the Commission finds reason to believe that the Committee
5 violated 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2 by knowingly accepting prohibited
6 corporate contributions.