

# FEDERAL ELECTION COMMISSION WASHINGTON, D.C.

June 25, 2024

James E. Tyrrell, III 1825 Eye Street, NW, Suite 900 Washington, DC 20006

Re: ADR 1157 (24L-04) and ADR 1158 (MUR 8121)

Jayme Stevenson for Congress and William G. Parrett, Treasurer (C00807610)

Dear Mr. Tyrrell:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on June 20, 2024 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is attached.

Under the terms of the agreement, a civil penalty in the amount of \$1,250 is due on or before July 26, 2024. Kindly review the attached payment instructions for details on payment methods and the collection of unpaid debts.

As the Committee wishes to terminate its political committee status, Respondents will also certify the closure of the Committee's federal account and file a termination report on or before September 26, 2024, and work with Commission staff to terminate their political committee status and reporting obligations with the Commission. The Committee will continue reporting until the termination has been approved by the Commission.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on

#### ADR115800018

the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

Rosa Marshall Assistant Director

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Alternative Dispute Resolution Office

Enc: Payment Instructions

Compliance Chart Negotiated Settlement

#### **ADRO Civil Penalty Payment Instructions**

You may remit payment by credit card, debit card, or ACH withdrawal from your bank account through Pay.gov, the federal government's secure portal for online collections. Visit <a href="www.fec.gov/adrpayment">www.fec.gov/adrpayment</a> to be directed to Pay.gov's FEC ADR Payment form.

### **Unpaid Civil Penalties**

Unpaid civil money penalties 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 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 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% 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.



Case Number: ADR 1157 and 1158 Source: RAD 24L-04 and MUR 8121 Case Name: Jayme Stevenson for Congress

#### NEGOTIATED SETTLEMENT

These matters were initiated by the Federal Election Commission (FEC or the Commission) pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities and the filing of a Complaint. Following review of these matters, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve these matters, the Commission entered into negotiations with James E. Tyrrell III, Esq., representing Jayme Stevenson for Congress and William G. Parrett, in the official capacity of Treasurer (the Committee or Respondents). It is understood that this settlement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in this referral and Complaint. The parties agree to resolve these matters according to the following terms:

- 1. The Commission enters into this settlement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
- 2. Respondents voluntarily enter into this settlement with the Commission.
- 3. The Reports Analysis Division (RAD) referred Respondents for failing to disclose all financial activity on its 2022 30-Day Post-General Report. On April 14, 2023, the Committee filed an Amended 2022 30-Day Post-General Report which disclosed \$157,511.70 in additional disbursements. In addition, on March 14, 2023, Sarah Locke, Executive Director of the Connecticut Democratic State Central Committee, filed a Complaint alleging that Respondents filed a 2022 30-Day Post-General Report which deliberately excluded contributions and expenditures made in connection with certain fundraising events.
- 4. Treasurers of political committees are required to report all financial activity, including all receipts and disbursements, pursuant to the FECA. 52 U.S.C. § 30104(b)(2), (4); 11 C.F.R. §§ 104.3(a)-(b).
- 5. The Committee states that due to a technical error, it inadvertently filed an incomplete version of the 2022 30-Day Post-General Report which disclosed no activity. Once the Complaint was brought to the Committee's attention, Respondents promptly amended the report to disclose all receipts and disbursements. Respondents also contend that the omission was due to an administrative oversight by the person to whom the reporting function was delegated and was

not an attempt to mislead the public or not disclose the activity. The Committee additionally notes that it intends to terminate its political committee status upon resolution of this matter.

- 6. Respondents, in order to resolve these matters, agree to:
  - a. Pay a civil penalty of \$1,250 within thirty (30) days of the effective date of this settlement. The Committee acknowledges that a larger civil penalty would be appropriate under the circumstances of this matter. However, the Committee indicates that a financial hardship prevents it from paying such penalty, and has submitted financial documentation in support of this claim. These submissions and representations are material representations attested to in this settlement. Due to the mitigating circumstances, which include the Committee's financial condition, it is requested that the Commission depart from the civil penalty that the Commission would otherwise seek for the violations at issue. Respondents understand that if evidence is discovered indicating that the Committee's financial condition is not as stated, a civil penalty of up to \$6,025 (less any previously paid amount) shall be due immediately.
  - b. As the Committee wishes to terminate its political committee status, Respondents will certify the closure of the Committee's federal account and file a termination report within ninety (90) days of the effective date of this settlement, and work with Commission staff to terminate their political committee status and reporting obligations with the Commission. The Committee will continue reporting until the termination has been approved by the Commission.
- 7. Respondents agree that all information provided to resolve these matters are true and accurate to the best of their knowledge and that they sign this settlement under penalty of perjury pursuant to 28 U.S.C. § 1746.
- 8. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance. Unpaid civil money penalties are subject to the Debt Collection Act of 1982 as amended by the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. § 3701 et seq. The Commission will transfer debt to the United States Department of the Treasury (Treasury) for collection.
- 9. This settlement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this settlement as set forth above and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
- 10. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 1157 (RAD 24L-04) and ADR 1158 (MUR 8121), and resolves those issues identified above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.

## FOR THE COMMISSION:

Rosa Marshall, Assistant Director Alternative Dispute Resolution Office

ROSAMMAN June 20, 2024

Date Signed

FOR THE RESPONDENTS:

James E. Tyrrell III (Jun 6, 2024 09:55 EDT)

James E. Tyrrell III, Esq. Representing Jayme Stevenson for Congress and William G. Parrett, Treasurer Jun 6, 2024

Date Signed