

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)

FEC IDENTIFICATION NUMBER

SHEILA JACKSON LEE FOR CONGRESS

C00287904

Mailing Address 4412 ALMEDA ROAD

City

HOUSTON

State

TX

ZIP Code

77004

June 6, 2024

To: Patrick Harkins, Senior Campaign Finance Analyst

Federal Elections Commission

From:Sheila Jackson Lee For Congress

Committee ID#: C00287904

Re:ADR Response Memorandum to accompany required 2022 Cycle Amendments

Issues 1-9 out of 25

The Sheila Jackson Lee Committee (hereinafter Committee) provides the following issue-by-issue response required by the negotiated ADR settlement that was finalized on December 6, 2023. In conjunction with this memorandum all reports from the 2022 Cycle have been amended. The amendments are due to the FEC by June 6, 2024.

The Committee would note that many delays in responses to RFAIs during the 2022 election cycle were due to the audit associated with the 2020 cycle. Said audit impacted the timing of RFAI responses because calculations were changing for the 2020 cycle which impacted the math associated with the 2022 cycle. The 2020 cycles amendments were made in July 2022.

This document is organized in the order of the issues listed in the ADRO Referral Response Guide that this Committee received from the ADR. Each issue is numbered in the order presented by the ADRO Referral Response Guide. There are 25

issues and responses contained in this document. Each issue is identified by the relevant Report, Original RFAI Due Date, Response Code and Reason For Code. Please find the issues and responses below.

Excessive, Prohibited and Other Impermissible Contributions or Transfers

#1

Report: 2021 Q3

RFAI Due Date: 1/18/22

Response Code: LAR

Reason For Code:

Schedule A of the Committees report disclosed the receipt of an excessive contribution totaling \$5,000.00, or 20.86% of the total contributions (Line 11(e), Column A of the Detailed Summary Page). This contribution was received from one (1) multicandidate committee.

The Committee filed a late Amended 2021 Q3 report on 4/28/22 which adequately addressed this issue by correcting the election designation of the apparently excessive contribution.

Committee Response: None required, issues previously adequately addressed per the Response Code LAR.

#2

Report: 2021 YE

RFAI Due Date: 4/18/22

Response Code: LAR

Reason For Code:

Schedule A of the Committees report disclosed the receipt of excessive and prohibited contributions totaling \$5,500.00, or 3.84% of the total contributions (Line 11(e), Column A of the Detailed Summary Page). These contributions were received from one (1) non-qualified committee

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and two (2) corporations, as detailed below:

Schedule A of the Committees report disclosed the receipt of an excessive contribution from one (1) non-qualified committee totaling \$2,100.00.

Schedule A of the Committees report disclosed the receipt of prohibited contributions totaling \$3,400.00 from two (2) corporations.

The Committee filed an FEC Form 99 on 4/28/22 which disclosed refunds of these excessive and prohibited contributions made outside the permissible timeframes. These refunds were later disclosed on the 2022 Q2 report.

Committee Response: None required, issues adequately addressed per the Response Code LAR.

#3

Report: Amended 2021 Q1, received 4/28/22:

RFAI Due Date: 6/23/22

Response Code: LIR

Reason For Code:

Schedule A of the Committees report disclosed the receipt of excessive contributions totaling \$16,200.00, or 12.78% of the Committees total contributions (Line 11(e), Column A of the Detailed Summary Page). These contributions were received from five (5) individuals and one (1) federal candidate committee.

The Committee filed an Amended 2022 Q1 on 6/4/23 which disclosed corrections of excessive contributions from one (1) individual and one (1) federal candidate committee.

Response:

The receipt of excessive contributions from five individuals and one federal campaign committee are alleged to have come from the following individuals. The status of each is provided below:

- 1- Husain, Khizer: Contribution of \$2,900.00 received on 3/26/2022 is not an excessive contribution.
- 2- Husain, Khizer Syed: Contribution of \$2,900.00 received on 3/26/2022. The Committee has determined that this is the same person as Husain, Khizer who is identified in the preceding contribution record. This makes this second contribution excessive. The Committee has determined that no refund was received by the Contributor and has ordered a refund of \$2,900.00 through ActBlue effective 6/3/2024.
- 3- Herrera, Jesus: Contribution of \$3,200.00 was received 5/15/2021 through ActBlue. It was a primary election contribution, not a general election contribution as errantly entered into the system. This has been changed and will be reflected in the amended report for 2021 Q2. The Committee has determined that no refund was received by the Contributor and has ordered a refund of \$300 through ActBlue effective 6/3/2024.
- 4- Jasani, Parvez: A contribution of \$2,900 on 3/25/2022 and another contribution of \$2,500.00 was received on the same date on 3/25/2022. The Committee has confirmed that the \$2,500.00 contribution was refunded on 4/28/2023 by Committee check #: 2304. As such, no further action is required.
- 5- Qadeer, Anwar: A primary election contribution of \$5,600.00 was received on 4/13/2021. A general election contribution of \$5,800.00 was received on 3/23/2022. This resulted in an excessive contribution of \$2,700.00 for the primary election and \$2,900 for the general election. Total excessive contributions totaled \$5,600.00. This Committee refunded the contributor \$5,600 on 4/28/2023 by Committee check #: 2306.
- 6- Qadeer, Asaf: Committee records show that \$3,800.00 was received from this contributor over two contributions: \$2,900

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on 3/26/2022 and \$900 on 8/9/2022. These were both general election contributions and created an excessive contribution of \$900.00. This Committee refunded the contributor \$900 on 8/9/2022 check #: 1221.

7- Filemon For Congress: This committee received a \$4,000 contribution on 2/15/2022 during the primary election period. This Committee redesignated the excessive portion of the contribution, \$2,000.00, on 2/15/2022. No further action is required.

#4
Report: 2022 Q3
RFAI Due Date: 124- /27/23
Response Code: LIR
Reason For Code:
Schedule A of the Committees report disclosed the receipt of excessive contributions totaling \$6,800.00, or 2.97% of the total contributions (Line 11(e), Column A of the Detailed Summary Page). These contributions were received from four (4) individuals, as detailed below:

Schedule A of the Committees report disclosed the receipt of excessive contributions from three (3) individuals totaling \$6,700.00.

Schedule A of the Committees report disclosed the receipt of a contribution designated for the 2022 Primary Election, which was received after the date of the Primary Election. The Committee had insufficient net debts to support this contribution, which totaled \$100.00 from one (1) individual.

The Committee filed an FEC Form 99 on 1/9/23 that inadequately addressed the issues.

The Committee filed an Amended 2022 Q3 on 6/4/23 which disclosed corrections of excessive contributions from two (2) individuals but did not adequately resolve all of the excessive and impermissible contributions.

Response:
The receipt of excessive contributions from four individuals and one federal campaign committee are alleged to have come from the following individuals. The status of each is provided below:
1- Horruba, Vincent: Vincent Horruba is misidentified, his name is actually Vincent Honrubia. This Committee received an excessive contribution of \$2,900 on 8/30/2022. The refund was issued on 4/28/2023 by check #: 2299. No further action is required.
2- Knapp Sr., Robert: This Committee received a \$5,000.00 contribution from this contributor on 9/8/2022. This Committee re-attributed \$2,100.00 of the contribution to his wife and joint account holder Deborah Knapp.
3- Knapp Jr., Robert: The Commission inquired as to whether a second contribution of \$1,500.00 was contributed by Robert Knapp, Sr. This Committee has confirmed that these contributions are from two different people and as such, there was no excessive contribution.
4- Qadeer, Asaf: Committee records show that \$3,800.00 was received from this contributor over two contributions: \$2,900 on 3/26/2022 and \$900 on 8/9/2022. These were both general election contributions and created an excessive contribution of \$900.00. This Committee refunded the contributor \$900 on 8/9/2022 check #: 1221.
5- Safir, Larry: This Committee received a \$2,900 contribution on 8/7/2022 and an additional contribution of \$2,900 on 8/30/2022. Both contributions were through ActBlue. This Committee has determined that no refund was received by the Contributor and has ordered a refund of \$2,900.00 through ActBlue effective 6/3/2024.
6- Liscum, Jason: This Committee errantly identified the contribution of \$100 received on 8/27/2022 as a primary

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election contribution rather than a general election contribution. This has been corrected in our records and will be reflected in the amended 2023 Q3 report.

7- Hilen, Delney: This Committee errantly identified the contribution of \$100 received on 8/27/2022 as a primary election contribution rather than a general election contribution. This has been corrected in our records and will be reflected in the amended 2023 Q3 report.

8- Burge, Dorothy: This Committee errantly identified the contribution of \$100 received on 8/26/2022 as a primary election contribution rather than a general election contribution. This has been corrected in our records and will be reflected in the amended 2023 Q3 report.

Haydern, Anne: This Committee errantly identified the contribution of \$100 received on 8/26/2022 as a primary election contribution rather than a general election contribution. This has been corrected in our records and will be reflected in the amended 2023 Q3 report.

#5

Report: 2022 12G

RFAI Due Date: 12/27/22

Response Code: LIR

Reason For Code:

Schedule A of the Committees report disclosed the receipt of an excessive contribution totaling \$2,900.00 or 3.77% of the total contributions (Line 11(e), Column A of the Detailed Summary Page). This contribution was received from one (1) individual.

The Committee filed an Amended 2022 12G on 6/4/23 that inadequately addressed the issue.

Response:

The receipt of excessive contributions from one individual and one PAC are alleged to have come from the following individuals. The status of each is provided below:

1- Moss, David: This Committee confirmed that two check contributions were received from the Moss Family on 10/11/2022 for the general election. The first is check #: 113000285 in the amount of \$2900. The second is check #: 11861 in the amount of \$2,900 drawn upon a joint account held by David Moss and his spouse Daphne Moss. This second check was attributed to Daphne Moss on 10/11/2022. This Committees contribution record has been corrected and will be reflected in the amended report.

2- The American Ethiopian Public Affairs Committee: This Committee has confirmed that on the date of this contribution the Contributor was a multicandidate PAC. The contribution of \$5,000.00 on 10/26/2022 was not excessive. No further action required.

#6

Report: 2022 30G

RFAI Due Date: 2/23/23

Response Code: IR

Reason For Code:

Schedule A of the Committees report disclosed the receipt of excessive contributions totaling \$10,474.84. Furthermore, Schedule B of the Committees report disclosed an excessive contribution totaling \$500.00. The excessive contributions received/made aggregated \$10,974.84, or 8.96% of the total contributions (Line 11(e), Column A, of the Detailed Summary Page). These contributions were received from six (6) individuals and made to one (1) federal candidate committee, as detailed

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below:

Schedule A of the Committees report disclosed the receipt of excessive contributions from six (6) individuals totaling \$10,474.84.

Schedule B of the Committees report disclosed an excessive contribution totaling \$500.00 made to one (1) federal candidate committee.

The Committee filed an FEC Form 99 on 2/21/23 that inadequately addressed the issues. Specifically, concerning the excessive contributions received from individuals, the Form 99 stated that they were refunded, redesignated, or reattributed, but no remedy date was provided, and the remedies were not disclosed in reports. Concerning the contribution made to another federal candidate, the Form 99 stated that the excessive amount was redesignated, but no redesignation date was provided, and the redesignation was not disclosed in reports.

The Committee filed an Amended 2022 30G on 6/4/23 which disclosed corrections of excessive contributions from two (2) individuals and one (1) federal candidate committee but did not adequately resolve all of the excessive contributions.

Response:

The receipt of excessive contributions from six individuals and one federal campaign committee are alleged to have come from the following individuals. The status of each is provided below:

- 1- Alvi, Mohammad: This Committee received a contribution of \$5,000.00 on 11/8/22. The excessive portion of this contribution, \$2,100.00 was refunded on 5/10/2023 with check #: 2307. No further action required.
- 2- Bhatti, Tahir: This Committee only deposited a single contribution of \$5,400 on 5/15/2021. \$2,500 was redesignated to the General election the same day. Mr. Bhatti also sent a \$5,000.00 contribution on 11/1/2022 however this contribution was never deposited; it was returned to the contributor. The \$5,000 contribution and subsequent attributions were errantly reported. This record has been corrected in the amendments accompanying this document.
- 3- Boddy, Julian: This Committee received a contribution of \$5,000.00 on 10/24/22. The excessive portion of this contribution, \$2,100.00 was refunded on 5/10/2023 with check #: 2308. No further action required.
- 4- Council, Tony: This Committee received a contribution of \$5,000.00 on 10/24/22. The excessive portion of this contribution, \$2,100.00 was refunded on 4/28/2023 with check #: 2302. No further action required.
- 5- Rupani, Nasruddin: This Committee confirmed that the \$874.84 on 10/25/2022 contribution was reattributed to his wife Farida Rupani on 10/25/2022. As such, there was no excessive contribution. This was addressed in the 6/4/23 amended filing. No further action required.
- 6- Turner, Robert: This Committee received a \$5,000.00 contribution on 11/8/2022. This Committee refunded the excessive portion of this contribution, \$2,100.00, on 11/29/2022 check #: 2252. No further action required.
- 7- Jahanna Hayes For Congress: This was resolved in the Amended Report for 2022 30G per the ADRO Referral Response Guide. No further action required.

Mathematical and Cash-on-Hand Discrepancies

#7

Report: Amended 2021 Q1, received 4/14/21

RFAI Due Date: 10/4/21

Response Code: NR

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Reason For Code:

The Committees report contained mathematical discrepancies totaling \$1,139,398.99.

Note: The Committee filed an Amended 2020 Year-End Report on 7/26/22, which created a cash-on-hand balance discrepancy of \$92,186.23. The beginning cash balance of the Amended 2021 Q1 report, \$167,819.79, is less than the ending cash balance of the Amended 2020 Year-End Report, \$260,006.02. This was not questioned in an RFAI due to the timing of the amendment.

Response:

The amendments accompanying this document have addressed the discrepant cash-on-hand issues. The 2020 Year End Report , Amendment #2, filed on 7/26/22 pursuant to the FEC audit of the 2020 cycle, provided a closing cash on hand balance of \$260,006.02. This now aligns with the Open cash on hand balance of Amendment #2 of the 2021 Q1 report which will be filed along with this response document today, 6/6/24. Further the amendments also address the Column A and Column B discrepancies as well, bringing the calculations within alignment.

#8

Report: 2021 Q2

RFAI Due Date: 10/4/21

Response Code: LIR

Reason For Code:

The Committees report contained mathematical discrepancies totaling \$871,326.01, as detailed below:

The beginning cash balance of the Committees report, -\$39,125.04, was less than the ending cash balance of the Committees previous report, \$145,226.86, a discrepancy of \$184,351.90.

The Committees report contained mathematical discrepancies totaling \$686,974.11.

The Committee filed an Amended 2021 Q2 on 10/26/21 that inadequately addressed the issues. This report reduced the cash-on-hand discrepancy to \$91,575.60 and increased other mathematical discrepancies to \$792,275.61.

The Committee filed a second Amended 2021 Q2 on 4/14/23 that inadequately addressed the issues. This report increased the cash-on-hand discrepancy to \$91,905.07 and decreased other mathematical discrepancies to \$691,580.46.

Response:

The Cash-on-hand discrepancy has been resolved between amendment #2 of the 2021 Q1 report and Amendment #3 of the 2021 Q2 report. Both are being filed along with this document on 6/6/24.

Additionally, the change in the total amount of receipts reflects an internal audit where this Committee failed to provide them. This adjustment was made to correct the record.

#9

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Report 2021 Q3, received 4/28/22:
RFAI Due Date: 4/14/23
Response Code: LAR
Reason For Code:
The Committees report contained mathematical discrepancies totaling

\$52,006.38, as detailed below:
The beginning cash balance of the Committees report, \$282,402.04, was less than the ending cash balance of the Committees previous report, \$302,905.23, a discrepancy of \$20,503.19.

The Committees report contained mathematical discrepancies totaling \$31,503.19.

The Committee filed an Amended 2021 Q3 on 4/14/23 that adequately addressed the issues.

Response:
Committee Response: None required, issues adequately addressed per the Response Code LAR.