



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 31, 2021

MARVIN J. DAVIES III, TREASURER
SHONTEL BROWN FOR CONGRESS
PO BOX 221232
BEACHWOOD, OH 44122

Response Due Date
12/06/2021

IDENTIFICATION NUMBER: C00764381

REFERENCE: 12 DAY PRE-SPECIAL REPORT (07/15/2021 - 10/13/2021)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions (to include loans, in-kind contributions, and advances) received by your committee after the close of books for the 12 Day Pre-Special Primary Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

2. Your committee filed 48-hour notices reporting the following "last minute" contributions (see attached). However, these contributions do not appear on Schedule A of this report. Please amend your report to include these contributions or provide an explanation of these apparent discrepancies. (11 CFR § 104.3(a)(4)(i))

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3. It appears that your committee may have filed duplicate 48-hour notices. Your committee filed two 48-hour notices for each of the attached contributions; however, these contributions are only disclosed once on Schedule A of your report. Please amend your report to include the additional contributions or provide an explanation of the apparent discrepancies. (11 CFR §104.3(a)(4)(i))

4. On Schedule B supporting Line 17 of your report, you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))

5. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the following description(s): "Consulting." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement and a non-exhaustive list of acceptable purposes are available on the FEC website at <http://www.fec.gov/help-candidates-and-committees/purposes-disbursement/>.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RAFI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1132.

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Sincerely,

A handwritten signature in black ink, appearing to read "Chris Jones", written in a cursive style.

Chris Jones
Senior Campaign Finance Analyst

Missing 48-Hour Notices
Shontel Brown for Congress (C00764381)

Contributor Name	Date	Amount	Election
Carney, Tana	7/27/2021	\$2,900.00	O2021
Newman, Herb	7/30/2021	\$2,500.00	O2021
Ratner, Jonathan	7/29/2021	\$1,000.00	O2021
Sherman, Bradley A.	7/21/2021	\$1,000.00	O2021

**Incorrectly Reported Receipts on 48-Hour Notices
Shontel Brown for Congress (C00764381)**

48-Hour Notices Filed/Contributions Not Disclosed on Schedule A

Contributor Name	Date	Amount
A Sherman, Bradley	7/26/2021	\$1,000.00
Carney, John J.	7/31/2021	\$2,900.00
Forman, Brett	7/22/2021	\$2,900.00
Friedkin, Amy	7/15/2021	\$1,000.00
Goldberg, Robert	7/22/2021	\$1,000.00
Hamill, Justin	7/22/2021	\$1,000.00
Hanerfeld, Harvey	7/22/2021	\$1,900.00
Horvitz, Michael	7/15/2021	\$1,000.00
Kurzweil, David	7/22/2021	\$1,000.00
Newman, Dianne R.	7/31/2021	\$1,700.00
Sternberg, Donna	7/22/2021	\$1,000.00
Sternberg, Hans	7/22/2021	\$1,000.00
Watts, Lisa	7/22/2021	\$1,000.00

Apparent Duplicate 48-Hour Notices Filed

Contributor Name	Date	Amount
DiGeronimo, Robbie	7/23/2021	\$1,000.00
DiGeronimo, Robert J	7/23/2021	\$1,000.00
DiGeronimo, Victor Jr.	7/23/2021	\$1,000.00
Love, Anthony A.	7/23/2021	\$2,100.00
Love, Anthony A.	7/23/2021	\$400.00
Newman, Dianne R.	7/24/2021	\$2,100.00
Newman, Dianne R.	7/24/2021	\$400.00