



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463


BEFORE THE FEDERAL ELECTION COMMISSION

In the Matters of)	
)	
Citizens for a Working America;)	MUR 7859
Joel Riter; Norman Cummings)	
)	
Jobs and Progress Fund, Inc.; Vaughn Church;)	MUR 7860
Thomas Norris; Mark Miller)	
)	

**SUPPLEMENTAL STATEMENT OF REASONS OF
COMMISSIONER SEAN J. COOKSEY**

In addition to the Statement of Reasons I joined in these matters with Vice Chair Dickerson and Commissioner Trainor,¹ I have previously explained my views on the statute of limitations and equitable remedies in a Supplemental Statement of Reasons in MURs 6917 & 6929 (Scott Walker, *et al.*) and MURs 6955 & 6983 (John R. Kasich, *et al.*).²

As detailed in that statement, I believe that mandating retrospective reporting and disclosure is a penalty subject to 18 U.S.C. § 2462's limitations period, and that even if mandatory disclosure were not a penalty, any reporting requirement would still be barred under the concurrent-remedies doctrine. I applied the same reasoning to these matters and accordingly voted to dismiss pursuant to the expiration of the statute of limitations.³



Sean J. Cooksey
Commissioner

December 17, 2021

Date

¹ Statement of Reasons of Vice Chair Dickerson and Commissioners Cooksey and Trainor (Dec. 17, 2021), MUR 7859 (Citizens for a Working America, *et al.*) and MUR 7860 (Jobs and Progress Fund, Inc., *et al.*).

² Supplemental Statement of Reasons of Commissioner Sean J. Cooksey (April 29, 2021), MURs 6917 & 6929 (Scott Walker, *et al.*) and MURs 6955 & 6983 (John R. Kasich, *et al.*).

³ Certification (Oct. 28, 2021), MUR 7859 (Citizens for a Working America, *et al.*); Certification (Oct. 28, 2021), MUR 7860 (Jobs and Progress Fund, Inc., *et al.*).