

Findings of Fact

Having reviewed the allegations and the record herein, I find:

1. The Respondent was an ANC Candidate for ANC 2E04.
2. Initial Notices of Non-Compliance were emailed to the Respondent on March 6, 2025, March 19, 2025, and April 9, 2025, extending the deadline to April 18, 2025.
3. Respondent did not comply.
4. By a Notice of Hearing and Statement of Violations dated July 3, 2025, OGC ordered the Respondent to file the ANC Financial Summary Statement by July 11, 2025, and appear at a virtual hearing on July 17, 2025, to show cause why Respondent had not timely filed the ANC Financial Summary Statement and should not be fined accordingly.
5. Respondent did not appear at the virtual hearing.
6. Respondent contacted the OGC to reschedule the hearing.
7. By a Notice of Hearing and Statement of Violations dated September 3, 2025, OGC ordered the Respondent to file the ANC Financial Summary Statement by September 15, 2025, and appear at a virtual hearing on September 18, 2025, to show cause why Respondent had not timely filed the ANC Financial Summary Statement and should not be fined accordingly.
8. Respondent testified that he was advised by his predecessor that he was exempt from filing. After research, he discovered that he was required to file an exemption.
9. Respondent requested more information regarding the timeline to file the exemption and agreed to file the ANC Statement. Respondent filed the ANC Statement on September 22, 2025, and is now compliant.

Conclusions of Law

Based on the record provided by OCF, I therefore conclude:

1. Respondent violated 3 D.C.M.R. §§ 3002.6 and 3002.7 (July 2019).
2. 3 DCMR §§ 3711.2(s), 3711.5, and 3711.6, established a fifty-dollar (\$50) fine per day, not including Saturdays, Sundays and holidays, for non-compliance up to a maximum of \$4,000.
3. The Director may ministerially impose fines upon the candidate, Treasurer/Candidate, committee, or designated agent pursuant to 3 DCMR § 3711.1.
4. For good cause shown pursuant to 3 DCMR § 3711.8, the Director of the Office of Campaign Finance (Director) may modify, rescind, dismiss, or suspend any fine.
5. At all times pertinent, the Respondent was required to file the ANC Financial Summary Statement by the extended filing date of April 18, 2025, but failed to comply.

6. Respondent filed the ANC Financial Summary Statement on August 25, 2025, and can be fined up to eighty-nine (89) days for a maximum fine of \$ 4,000, in this matter.

Recommendation

In view of the foregoing and information included in the record, I HEREBY RECOMMEND that the Director suspend the \$ 4,000 fine against Knox Graham, ANC Candidate, for good cause, in this matter.

September 25 2025

Date

/s/ Nereida Gonzalez

**Nereida Gonzalez
Attorney Advisor**

Concurrence

In view of the foregoing, I hereby **CONCUR** with the Recommendation.

September 25, 2025

Date

/s/ William O. SanFord

**William O. SanFord
General Counsel**

ORDER OF THE DIRECTOR

IT IS ORDERED that the fine for \$ 4,000 against Knox Graham, ANC Candidate, shall be suspended in this matter.

September 25, 2025

Date

/s/ Cecily E. Collier-Montgomery

**Cecily E. Collier-Montgomery
Director**

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IN THE MATTER OF: Knox Graham

Docket No.: 2025-A-004

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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a true copy of the **ORDER** has been served to Knox Graham, Candidate ANC 2E08 via mail at 3700 O Street, NW – Unit VCE 662, Washington, D.C. 20057 and electronic mail at KnoxGraham04@gmail.com on this 25th day of September, 2025.

/s/ Nereida Gonzalez

Nereida Gonzalez

Notice

Any party adversely affected by an Order of the Director may: (1) file a Motion for Reconsideration (Motion) with the OCF within five (5) days after receipt of an Order, provided that, relevant evidence was omitted from consideration at the hearing (3 DCMR § 3709.13); or (2) obtain review of the Order by filing a request for a hearing *de novo* with the Board of Elections within fifteen (15) days from the date of issuance of an Order. Any fine imposed by the Director, pursuant to § 3711.2 shall become effective on the sixteenth (16th) day following the issuance of a decision or Order; provided that, the Respondent does not request a hearing *de novo* with the Board of Elections. Fines imposed shall be paid within ten (10) days of the effective date of the issued Order of the Director. Make payment by check or money order, payable to: District of Columbia Treasurer/Candidate. Send payment to the *Office of Campaign Finance, 1015 Half Street S.E., Suite 775, Washington, DC 20003*.