

**BEFORE THE OFFICE OF CAMPAIGN FINANCE
DISTRICT OF COLUMBIA BOARD OF ELECTIONS
1015 HALF STREET, S.E., SUITE 775
WASHINGTON, D.C. 20003**

IN THE MATTER OF

Credit Union PAC of Washington DC
Cynthia Hereth, Treasurer
8975 Guilford Road, Suite 90
Columbia, MD 21046
Chereth@mddccua.org

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) Date: May 28, 2025
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) Docket No: 2025 P-001
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ORDER

Statement of the Case

This matter came before the Office of Campaign Finance (“OCF”) Office of the General Counsel following a determination by its Public Information and Records Management Division that: **Cynthia Hereth, Treasurer** of the Credit Union PAC of Washington DC, Political Action Committee (“committee”), failed to timely file the March 10th Report of Receipts and Expenditures that was due on March 11, 2024, in violation of the Campaign Finance Act of 2011, District of Columbia Official Code § 1-1163.09 and the District of Columbia Municipal Regulations, 3 DCMR § 3017.2.

By Notice of Hearing, Statement of Violations and Order of Appearance dated April 11, 2025, the Office of the General Counsel (“OGC”) ordered Cynthia Hereth, Treasurer (“Respondent”) to appear at a scheduled virtual hearing on April 30, 2025, and show cause why the Respondent should not be found in violation of the D.C. Official Code § 1-1163.09 and 3 DCMR § 3017.2 and fined accordingly.

Summary of Evidence

On April 11, 2025, OGC issued notice to the Respondent to appear at a scheduled virtual hearing on April 30, 2025. In the notice, OGC offered the Respondent the opportunity to submit a written Statement of Explanation (“Statement”) in lieu of appearing at the scheduled hearing on April 30, 2025, that explained the reason(s) for the untimely filing of the December 10th Report.

On April 14, 2025, the Respondent provided a type-written Statement, via email to OGC. In the Statement, the Respondent explained that the committee underwent an audit review by the Reports, Analysis and Audit Division (“RAAD”) of OCF that required the submission of documentation and amended reports. In the Statement, the Respondent further explained that the Respondent as unaware that the committee had to continue to file reports during an audit review by RAAD. However, upon notice from OGC regarding the delinquent report, the Respondent successfully filed the March 10th Report on April 26, 2025. Therefore, the Respondent and the committee are now compliant with the reporting and disclosure requirements of the March 10th Report of Receipts and Expenditures.

Findings of Fact

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

1. Cynthia Hereth is the Treasurer of the Credit Union PAC of Washington DC Political Action Committee.
2. At all times pertinent, the Respondent was required to file the March 10th Report of Receipts and Expenditures by March 11, 2024.
3. The Respondent failed to file the March 10th Report on March 11, 2024.
4. By Notice of Hearing, Statement of Violations and Order of Appearance dated April 11, 2025, the OGC ordered the Respondent to appear at a scheduled virtual hearing on April 30, 2025, to answer the alleged violations.
5. On April 14, 2025, the Respondent opted to submit a Statement explaining the reason(s) for the untimely filing of the March 10th Report in lieu of appearing at the rescheduled hearing on April 30, 2025.
6. The Respondent explained that the committee underwent an audit review by RAAD, and that the Respondent was not aware that the Respondent had to continue to file reports during an audit review.
7. The Respondent filed the March 10th Report of Receipts and Expenditures on April 26, 2025.
8. Thus, the Respondent and the committee are now compliant with the reporting and disclosure requirements of the March 10th Report filing and do not have a significant history of other delinquent report filings.

Conclusions of Law

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

1. The Respondent violated D.C. Official Code § 1-1163.09 (a)(1)(b) and 3 DCMR § 3017.2.
2. 3 DCMR § 3711.2(f) established a fifty-dollar (\$50) fine, per day, for failure to timely file a Report of Receipts and Expenditures.
3. 3 DCMR § 3711.1 maintains that a fine shall attach for each day of noncompliance; up to a maximum of \$4,000, pursuant to D.C. Official Code § 1-1163.35(a)(3).
4. The Director may ministerially impose fines upon the candidate, treasurer, committee, or designated agent, pursuant to 3 DCMR § 3711.1.
5. For good cause shown pursuant to 3 DCMR § 3711.8, the Director of Campaign Finance (Director) may modify, rescind, dismiss, or suspend any fine.

6. At all times pertinent, the Respondent was required to file the March 10th Report of Receipts and Expenditures on March 11, 2024, but failed to comply.
7. The Respondent provided a credible explanation for the untimely filing of the March 10th Report.
8. The March 10th Report of Receipts and Expenditures was filed on April 26, 2025.
9. To date, the Respondent and the committee remain compliant with the reporting and disclosure requirements under the Campaign Finance Laws.

Recommendation

In view of the foregoing and information included in the record, **I HEREBY RECOMMEND** that the Director **SUSPEND** the imposition of any fine against Cynthia Hereth, Treasurer and the Credit Union PAC of Washington DC Committee in this matter.

May 28, 2025

Date

/s/ Kalvanetta K. Peete

Kalvanetta K. Peete
Hearing Officer

Concurrence

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

May 28, 2025

Date

/s/ William O. SanFord

William O. SanFord
General Counsel

ORDER OF THE DIRECTOR

IT IS ORDERED that the imposition of a fine is hereby **SUSPENDED** against Cynthia Hereth, Treasurer and the Credit Union PAC of Washington DC Committee in this matter.

May 28, 2025

Date

/s/ Cecily E. Collier-Montgomery

Cecily E. Collier-Montgomery
Director

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that a true copy of the **ORDER** has been served on Cynthia Hereth, Treasurer, via electronic mail at: chereth@mddccua.org on this 28th day of May 2025.

/Kalvanetta K. Peete/

Kalvanetta K. Peete

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. Send payment to the Office of Campaign Finance, 1015 Half Street S.E., Suite 775, Washington, DC 20003.