

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FEDERAL ELECTION COMMISSION,	)	
	)	
Plaintiff,	)	Civ. No. 21-6095
	)	
v.	)	
	)	
LATPAC,	)	
	)	
and	)	
	)	
CHALIN M. ASKEW, in his official capacity as treasurer of LATPAC,	)	NOTICE OF MOTION FOR DEFAULT JUDGMENT
	)	
Defendants.	)	

**NOTICE OF FEDERAL ELECTION COMMISSION’S  
MOTION FOR DEFAULT JUDGMENT**

**PLEASE TAKE NOTICE** that, upon this Notice of Motion, plaintiff Federal Election Commission’s (“Commission”) Memorandum of Law in Support of its Motion for Default Judgement, the Declarations of Dominique Dillenseger, Kristin D. Roser, and Haven G. Ward in Support of the Commission’s Motion for Default Judgment and exhibits attached thereto, the Clerk of the Court’s Certificate of Default, and upon all prior pleadings and proceedings herein, the Commission will and does move the Court, before the Honorable Stewart D. Aaron at the United States District Court located at 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an Order pursuant to Federal Rules of Civil Procedure 55(b)(2) and 65(d), Local Civil Rule 55.2(b), and the Court’s January 13, 2022 Order (Docket No. 25) GRANTING the Commission’s Motion for Default Judgment and awarding the following relief:

1. Declaration under 52 U.S.C. § 30109(a)(6)(B) that defendants LatPAC and Chalin M. Askew, in his official capacity as LatPAC's treasurer, violated 52 U.S.C. § 30104(a) and (b);
2. Order defendants LatPAC and Chalin M. Askew, in his official capacity as LatPAC's treasurer, under 52 U.S.C. § 30109(a)(6)(B) to pay a civil penalty in an amount equal to or greater than \$56,400, jointly and severally, for their violations of 52 U.S.C. § 30104(a) and (b), plus post-judgment interest, within 60 days of entry of default judgment;
3. Order defendants LatPAC and Chalin M. Askew, in his official capacity as LatPAC's treasurer, under 52 U.S.C. § 30109(a)(6)(B) to file all reports and disclose all information to the Commission that were previously required to be filed and disclosed under 52 U.S.C. § 30104(a) and (b) and attendant Commission regulations within 30 days of entry of default judgment;
4. Permanently enjoin defendants LatPAC and Chalin M. Askew, in his official capacity as LatPAC's treasurer, under 52 U.S.C. § 30109(a)(6)(B) from future violations of 52 U.S.C. § 30104(a) and (b); and
5. Grant the Commission such other relief as may be appropriate.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Court's January 13, 2022 Order, any papers in opposition to this motion must be filed by no later than February 25, 2022.

Respectfully submitted,

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February 3, 2022