FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1451

DATE SCANNED 11/27/06

SCANNER NO. 2

SCAN OPERATOR ESS

26092593053

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 30, 2006

MEMORANDUM

TO: THE COMMISSION

THROUGH: ROBERT J. COSTA
ACTING STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REASON TO BELIEVE RECOMMENDATION -
2005 YEAR END REPORT
FOR THE ADMINISTRATIVE FINES PROGRAM

Attached is a list of political committees and their treasurers who failed to file, or failed to timely file, the 2005 Year End Report in accordance with 2 U.S.C. 434(a). On December 28, 2005, Prior Notice was sent to the political committees and their treasurers, informing them that the Year End Report was due on January 31, 2006. The report should have covered the period ending on December 31, 2005.

The committees listed in the attached RTB Circulation Report either failed to file the report or filed the report more than five (5) days after the due date. In accordance with the schedule of civil money penalties located within 11 CFR §111.43, these committees should be assessed the civil money penalties highlighted on the report attached.

Recommendation

(1) Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Report violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.

(2) Send the appropriate mailgrams.

AF #	COMMITTEE NAME / COMMITTEE ID / RECEIPT DATE	TREASURER / DAYS LATE	LEVEL OF ACTIVITY	STATE / THRESHOLD AMOUNT	CANDIDATE NAME / SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01442	GARY DODDS FOR CONGRESS C00413997 02/10/2006	FRANK G MEANOR JR 10	$74,607	NH $111,382	DODDS, GARY B No	0	$1,050
AF01438	AMERICAN GAMING ASSOCIATION POLITICAL ACTION COMMITTEE C00309146 02/22/2006	JUDY PATTERSON 22	$97,900	DC $144,650	No	0	$2,600
AF01439	BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC) C00204388 02/13/2006	IRA LAMEL 13	$95,688	NY $108,405	No	0	$1,700

FEDERAL ELECTION COMMISSION 2005-2006
Reason to Believe Circulation Report
2005 YEAR-END

AF # / COMMITTEE NAME / COMMITTEE ID / RECEIPT DATE	TREASURER / DAYS LATE	LEVEL OF ACTIVITY	STATE / THRESHOLD AMOUNT	CANDIDATE NAME / SENSITIVE	PREVIOUS VIOLATIONS	CIVIL MONEY PENALTY
AF01451 REGIONS FINANCIAL CORPORATION COMMITTEE ON GOVERNMENT AFFAIRS			AL			
C00179473	Sawyer, Chris		$529,649	No	0	
Not Filed		$176,549 (est)				$5,500
AF01450 MONROE COUNTY DEMOCRATIC COMMITTEE			MI			
C00376384	KAY SISUNG		$1,464,975	No	1	
Not Filed		$183,121 (est)				$6,875

MEMORANDUM

TO: OFFICE OF THE COMMISSION SECRETARY

FROM: STAFF DIRECTOR

DATE: March 30, 2006

SUBJECT: Administrative Fine – Reason to Believe for the 2005 Year End Report

COMMISSION MEETINGS

The attached document is submitted for:

☐ Open Meeting ______________________ (insert date)

☐ Executive Session ______________________ (insert date)

26039253053

CIRCULATION

☐ **24-Hour Tally Vote**
- ☐ Sensitive
- ☐ Non-Sensitive

☑ **72-Hour Tally Vote**
- ☑ Sensitive
- ☐ Non-Sensitive

☐ **24-Hour No Objection**
- ☐ Sensitive
- ☐ Non-Sensitive
- ☐ Personnel

☐ **Information**
- ☐ Sensitive
- ☐ Non-Sensitive

DISTRIBUTION

☐ Commissioners, OGC (3), Staff Director, Public Disclosure & Press Office

☑ Compliance

☐ Audit Matters

☐ Non-Filers

☐ No-Objection Personnel

☐ 6 Commissioners Only

☐ Miscellaneous

☐ Other (see distribution below)

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☐ **Open Session Agenda Documents**
- ☐ Release Immediately
- ☐ Hold Until ______________________

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reason To Believe Recommendation - 2005	)	
Year End Report for the Administrative	)	
Fines Program:	)	
GARY DODDS FOR CONGRESS, and	)	AF# 1442
FRANK G MEANOR JR as treasurer;	)	

AMERICAN GAMING ASSOCIATION	)	AF# 1438
POLITICAL ACTION COMMITTEE, and	)	
JUDY PATTERSON as treasurer;	)	
BI-COUNTY POLITICAL ACTION	)	AF# 1439
COMMITTEE (FKA SUFFOLK PAC), and	)	
IRA LAMEL as treasurer;	)	

REGIONS FINANCIAL CORPORATION	)	AF# 1451
COMMITTEE ON GOVERNMENT	)	
AFFAIRS, and Sawyer, Chris as treasurer;	)	
MONROE COUNTY DEMOCRATIC		AF# 1450
COMMITTEE, and KAY SISUNG as		
treasurer;		

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on April 04, 2006 the Commission took the following actions on the Reason To Believe Recommendation - 2005 Year End Report for the Administrative Fines Program as recommended in the Reports Analysis Division's Memorandum dated March 30, 2006, on the following committees:

AF#1442 Decided by a vote of 6-0 to: (1) find reason to believe that GARY DODDS FOR CONGRESS, and FRANK G MEANOR JR as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and Weintraub voted affirmatively for the decision.

AF#1438 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN GAMING ASSOCIATION POLITICAL ACTION COMMITTEE, and JUDY PATTERSON as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report;

(2) send the appropriate mailgram. Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and Weintraub voted affirmatively for the decision.

AF#1439 Decided by a vote of 6-0 to: (1) find reason to believe that BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC), and IRA LAMEL as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and Weintraub voted affirmatively for the decision.

AF#1451 Decided by a vote of 6-0 to: (1) find reason to believe that REGIONS FINANCIAL CORPORATION COMMITTEE ON GOVERNMENT AFFAIRS, and Sawyer, Chris as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and Weintraub voted affirmatively for the decision.

AF#1450 Decided by a vote of 6-0 to: (1) find reason to believe that MONROE COUNTY DEMOCRATIC COMMITTEE, and KAY SISUNG as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate mailgram. Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and Weintraub voted affirmatively for the decision.

Attest:

April 4, 2006
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

26092593062

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 6, 2006

Chris Sawyer
Regions Financial Corporation Committee On Government Affairs
417 20th Street North
Birmingham, AL 35203

C00179473
AF#: 1451

Dear Chris Sawyer:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year End Report of Receipts and Disbursements every calendar year. This report, covering the period through December 31st, shall be filed no later than January 31st. 2 U.S.C. 434(a). You were previously notified of the due date for this report. Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act was further amended in 1999 to permit the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. 434(a). 2 U.S.C. 437g(a)(4). On 4/4/2006, the FEC found that there is reason to believe ("RTB") that Regions Financial Corporation Committee On Government Affairs and you, as treasurer, violated 2 U.S.C. 434(a) by failing to file timely this report on or before January 31st. Based on the FEC's schedules of civil money penalties at 11 C.F.R. 111.43, the amount of your civil money penalty calculated at the RTB stage is $5500. It is due by 5/14/2006 and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive
Level of Activity: $176549
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

To Pay the Calculated Civil Money Penalty

To pay the calculated civil money penalty, send the enclosed remittance and your payment to the FEC at the address on page 3. Upon receipt of your payment, the FEC will send you a final determination letter.

To Challenge the RTB Finding and/or Calculated Civil Money Penalty

To challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found on page one, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received by 5/14/2006. Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty. The FEC will only consider challenges that are based on a factual error, miscalculation of the calculated civil money penalty by the FEC, or the based on a factual error, miscalculation of the calculated civil money penalty by the FEC, or the existence of extraordinary circumstances that persisted for more than 48 hours that were beyond your control and prevented you from filing the report in a timely manner. Your response must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. Examples of circumstances that will not be considered extraordinary include, but are not limited to, negligence, problems with vendors or contractors, staff illness, computer failures and similar circumstances. 11 C.F.R. 111.35(b)(1)(iii) and (4).

Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of your right to present such argument in a petition to the district court under 2 U.S.C. 437g. 11 C.F.R. 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

If You Do Not Pay The Calculated Civil Money Penalty or Submit a Challenge

If you do not pay the calculated civil money penalty or submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Regions Financial Corporation Committee on Government Affairs and you, as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982("DCA")as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 C.F.R. 111.45.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

Additional information on the FEC's administrative fine program, including the final regulations, is located at the FEC's website at www.FEC.gov. If you have questions regarding the payment of the calculated civil money penalty, please contact Elizabeth Goings in the Reports Analysis Division at our toll free number (800)424-9530 (at the prompt press 5) or (202)694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

Michael E. Toner
Chairman

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. 111.43, the amount of your civil money penalty calculated at RTB is $5500 for the 2005 Year-End Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by 5/14/2006. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Regions Financial Corporation Committee On Government Affairs

FEC ID#: C00179473

AF#: 1451

PAYMENT DUE DATE: 5/14/2006

PAYMENT AMOUNT DUE: $5500

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 2006

MEMORANDUM

TO: THE COMMISSION

THROUGH: ROBERT J. COSTA
ACTING STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: WITHDRAWAL AND RESUBMISSION OF FINAL DETERMINATION RECOMMENDATION - 2005 YEAR END REPORT FOR THE ADMINISTRATIVE FINES PROGRAM

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2005 Year End Report. The first list represents those committees that have paid the civil money penalty while the second list represents those that have not paid. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR 111.34 and 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

RAD Recommendation

(1) Make final determinations that the political committees and their treasurers on the attached lists violated 2 U.S.C. 434(a) and assess the civil money penalties so indicated.

(2) Send the appropriate letters.

26092593068

FEDERAL ELECTION COMMISSION 2005-2006
FINAL DETERMINATION CIRCULATION REPORT
PAID

AF # / CANDIDATE NAME	COMMITTEE NAME / RECEIPT DATE / REASON TO BELIEVE DATE	DAYS LATE	COMMITTEE ID / LEVEL OF ACTIVITY / CIVIL MONEY PENALTY	TREASURER	STATE / DATE PAID	PREVIOUS VIOLATIONS	REPORT TYPE	AMOUNT PAID
AF1438	AMERICAN GAMING ASSOCIATION POLITICAL ACTION COMMITTEE				DC			
			C00309146	JUDY PATTERSON			2005 YEAR-END	
	02/22/2006	22	$97,900			0		
	04/04/2006		$2,600		04/26/2006			$2,600
AF1439	BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC)				NY			
			C00204388	IRA LAMEL			2005 YEAR-END	
	02/13/2006	13	$95,688			0		
	04/04/2006		$1,700		05/02/2006			$1,700

26092593069

FEDERAL ELECTION COMMISSION 2005-2006
FINAL DETERMINATION CIRCULATION REPORT
NOT PAID

AF # / CANDIDATE NAME / RECEIPT DATE / RTB DATE	COMMITTEE NAME / DAYS LATE	COMMITTEE ID / RTB PENALTY	LEVEL OF ACTIVITY / TREASURER / DAYS SINCE RTB	STATE	PREVIOUS VIOLATIONS	REPORT TYPE / FINAL CIVIL MONEY PENALTY
AF1442	GARY DODDS FOR CONGRESS			NH		
DODDS, GARY B		C00413997	FRANK G MEANOR JR			2005 YEAR-END
02/10/2006	10		$74,607		0	
04/04/2006		$1,050	57			$1,050
AF1450	MONROE COUNTY DEMOCRATIC COMMITTEE			MI		
		C00376384	KAY SISUNG			2005 YEAR-END
Not Filed			$182,106 (est)		1	
04/04/2006		$6,875	57			$6,875
AF1451	REGIONS FINANCIAL CORPORATION COMMITTEE ON GOVERNMENT AFFAIRS			AL		
		C00179473	Weaver, David C.			2005 YEAR-END
04/12/2006	Not Filed		$344,266		0	
04/04/2006		$5,500	57			$5,500

MEMORANDUM

TO: OFFICE OF THE COMMISSION SECRETARY

FROM: STAFF DIRECTOR

DATE: May 31, 2006

SUBJECT: Administrative Fine Program – Withdrawal and Resubmission of the Final Determination Recommendation for the 2005 Year End Report.

COMMISSION MEETINGS

The attached document is submitted for:

- ☐ Open Meeting ______________________ (insert date)
- ☐ Executive Session ______________________ (insert date)

CIRCULATION

- ☐ **24-Hour Tally Vote**
  - ☐ Sensitive
  - ☐ Non-Sensitive
- ☑ **72-Hour Tally Vote**
  - ☑ Sensitive
  - ☐ Non-Sensitive
- ☐ **24-Hour No Objection**
  - ☐ Sensitive
  - ☐ Non-Sensitive
  - ☐ Personnel
- ☐ **Information**
  - ☐ Sensitive
  - ☐ Non-Sensitive

DISTRIBUTION

- ☐ Commissioners, OGC (3), Staff Director, Public Disclosure & Press Office
- ☑ Compliance
- ☐ Audit Matters
- ☐ Non-Filers
- ☐ No-Objection Personnel
- ☐ 6 Commissioners Only
- ☐ Miscellaneous
- ☐ Other (see distribution below)

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- ☐ **Open Session Agenda Documents**
  - ☐ Release Immediately
  - ☐ Hold Until ______________________

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Administrative Fines Final Determination	)	
Recommendation for the 2005 Year End	)	
Report.:	)	
GARY DODDS FOR CONGRESS, and	)	AF# 1442
FRANK G MEANOR JR as treasurer;	)	
MONROE COUNTY DEMOCRATIC	)	AF# 1450
COMMITTEE, and KAY SISUNG as	)	
treasurer;	)	
REGIONS FINANCIAL CORPORATION	)	AF# 1451
COMMITTEE ON GOVERNMENT	)	
AFFAIRS, and Weaver, David C. as	)	
treasurer;	)	

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on June 05, 2006 the Commission took the following actions on the Administrative Fines Final Determination Recommendation for the 2005 Year End Report. as recommended in the Reports Analysis Division's Memorandum dated May 31, 2006, on the following committees:

AF#1442 Decided by a vote of 6-0 to: (1) make a final determination that GARY DODDS FOR CONGRESS, and FRANK G MEANOR JR as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate mailgram. Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and Weintraub voted affirmatively for the decision.

AF#1450 Decided by a vote of 6-0 to: (1) make a final determination that MONROE COUNTY DEMOCRATIC COMMITTEE, and KAY SISUNG as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate mailgram. Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and Weintraub voted affirmatively for the decision.

AF#1451 Decided by a vote of 6-0 to: (1) make a final determination that REGIONS FINANCIAL CORPORATION COMMITTEE ON GOVERNMENT AFFAIRS, and Weaver, David C. as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate mailgram. Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and Weintraub voted affirmatively for the decision.

Attest:

June 6 2006
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

June 14, 2006

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Weaver, David C., Treasurer
Regions Financial Corporation Committee
417 20th Street North
Birmingham, AL 35203

C00179473
AF# 1451

Dear Weaver, David C.,

On 4/4/2006, the Federal Election Commission ("FEC") found reason to believe ("RTB") that Regions Financial Corporation Committee and you, as treasurer, violated 2 U.S.C. 434(a) for failing to timely file the 2005 Year-End Report. By mailgram dated 4/6/2006, the FEC sent you notification of the RTB finding that included a civil money penalty calculated at the RTB stage of 5500 in accordance with the schedule of penalties at 11 C.F.R. 111.43. Within 40 days of the FEC's RTB finding, you were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or your written response within the time permitted. Therefore, the FEC made a final determination on 6/6/2006 that you, as treasurer, and Regions Financial Corporation Committee violated 2 U.S.C. 434(a) and assessed a civil money penalty in the amount of $5500 in accordance with 11 C.F.R. 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive
Level of Activity: $344266
Number of Previous Violations: 0 Number of Days Late: Not Filed

To Pay the Civil Money Penalty

To pay the civil money penalty, send the enclosed form and your payment to the address on page 3 within 30 days of receipt of this letter.

If You Do Not Pay the Civil Money Penalty

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. 3701 et seq. If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the FEC will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of its transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 18% of the civil money penalty for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, transfer to Treasury, Treasury will contact the debtor and request payment. Treasury currently charges a fee of 18% of the civil money penalty for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will transfer the debt to a private collection agency ("PCA"). If the debt is referred to a PCA, the Treasury and PCA collect a fee of 28% of the civil money penalty amount which will be added to the amount of the civil money penalty. If the debt remains unpaid, Treasury may recommend that the FEC refer the matter to the Department of Justice for litigation.

If You Choose to Appeal the Final Determination or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the district court of the United States for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 2 U.S.C. 437g(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondent's right to present such argument in a petition to the district court under 2 U.S.C. 437g. 11 C.F.R. 111.38.

The confidentiality provisions at 2 U.S.C. 437g(a)(12) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Shara Coutourier at Federal Election Commission, 999 E St., NW, Washington, DC 20463, or our toll free number (800)424-9530 (at the prompt, press 5) or (202)694-1130.

Sincerely,

Michael E. Toner
Chairman

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. 111.43, the civil money penalty is $5500 for the 2005 Year-End Report.

This penalty should be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The form and payment are due within 30 days of receipt of this letter.

Payments by Personal Check

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your originally check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the originally check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Regions Financial Corporation Committee

FEC ID: C00179473

AF#: 1451

PAYMENT AMOUNT DUE: $5500

AGREEMENT AS TO THE METHOD OF CERTIFYING DEBTS SUBMITTED TO THE FINANCIAL MANAGEMENT SERVICE'S CROSS-SERVICING PROGRAM

This Agreement (Agreement) is submitted by:

Creditor Agency: Federal Election Commission

Date of Agreement: November 30, 2005

The Creditor Agency agrees that:

I. This Agreement covers all debts, including updates, changes, and modifications (Debts) submitted on or after the date of this Agreement, by Creditor Agency to the Financial Management Service (FMS), a bureau of the U.S. Department of the Treasury, for collection through the FMS's Cross-Servicing Program (Cross-Servicing);

II. Creditor Agency will submit debts to Cross-Servicing via Electronic Transmission of "Add Records" or "Update Records," as described in the attached Exhibit A. Each time the Creditor Agency submits a Debt via an Add Record or Update Record, the Creditor Agency is certifying the Debt;

III. Any person who submits Debts via an Add Record or Update Record has or will have delegated authority to certify the Debts on behalf of the head of the Creditor Agency, and the Creditor Agency will provide a copy of this Agreement to any such person; and,

IV. By submitting Debts via an Add Record or Update Record, the person submitting such Debts is certifying to the U.S. Department of the Treasury, under penalty of perjury pursuant to 31 U.S.C. § 3716, 31 U.S.C. § 3720A, and 28 U.S.C. § 1746, that to the best of his or her knowledge and belief, the following is true and correct:

1. ***Valid Debts.*** The debts are delinquent, valid and legally enforceable in the amounts stated. No debtor has repaid or agreed to repay the claim under a signed repayment agreement or filed for review of the claim.

2. ***No Bar to Collection.*** The debts are not subject to any circumstances that legally preclude or bar collection. There are no foreclosures pending with respect to any collateral securing a debt. The Agency's records do not show that any debtor owing a debt has filed for bankruptcy protection. Alternatively, the Agency can clearly establish that any automatic stay has been lifted or is no longer in effect.

3. ***Due Process.*** The Agency, at a minimum, has made reasonable efforts to obtain payment of the debt, demanded payment, and provided the debtor with the notice and opportunities described below:

A. At least 30 days prior to the date of this certification, the Agency has provided, or made reasonable efforts to provide each debtor with:

- written notification, at the debtor's most current known address, of the nature and the amount of the debt, the intention of the Agency to collect the debt through referral to Treasury, and actions that may be taken by Treasury including referral of the debt to a private collection agency and referral of the debt to the Department of Justice for litigation;

- an opportunity to inspect and copy the records of the Agency with respect to the debt; and

- an opportunity for review within the Agency of the determination of the Agency with respect to the debt, including the opportunity to present evidence that all or part of the debt is not past-due or legally enforceable.

B. The Agency has considered any evidence presented by the debtor and determined that the amount of the debt is past-due and legally enforceable and there are no pending appeals of such determination.

4. ***Interest and Penalties.*** The Agency has complied with all of the provisions of 31 U.S.C. § 3717 and the Federal Claims Collection Standards, as well as other statutes, regulations and policies applicable to the Agency's assessment of interest, penalties and administrative costs. The Agency has mailed a written notice to all debtors explaining the Agency's requirements concerning the charges.

CERTIFICATION: Pursuant to 28 U.S.C. § 1746, I certify that I have been delegated authority to execute this Agreement on behalf of the head of my agency.

Shawn Woodhead Werth

Shawn Woodhead Werth

Director, Office of Administrative Review

FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1451

DATE SCANNED 11/27/06

SCANNER NO. 2

SCAN OPERATOR EES

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