



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1617

DATE SCANNED 2/21/08

SCANNER NO. 2

SCAN OPERATOR ESJ

28092620140



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

COMMISSION
SECRETARIAT

2007 APR -5 A 9: 36

April 4, 2007

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: PATRINA M. CLARK
STAFF DIRECTOR *PMC*

MARGARITA MAISONET *MA*
CHIEF COMPLIANCE OFFICER

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

SUBJECT: REASON TO BELIEVE RECOMMENDATION - 2006 12 DAY
PRE-GENERAL (QUARTERLY FILERS) AND 30 DAY POST-
GENERAL REPORT FOR THE ADMINISTRATIVE FINE
PROGRAM

Attached are two lists of political committees and their treasurers who failed to file or timely file the 2006 12 Day Pre-General and/or the 2004 30 Day Post-General Reports in accordance with 2 U.S.C. 434(a). The 12 Day Pre-General list is comprised of unauthorized committees filing quarterly that made general election contributions or expenditures from October 1, 2006 through October 18, 2006. The 30 Day Post-General list is comprised of authorized committees whose candidates sought election in the November 7th General Election, as well as unauthorized committees filing either quarterly or monthly.

The 12 Day Pre-General Report was due on October 26, 2006 and should cover the reporting period from October 1, 2006 through October 18, 2006. The 30 Day Post-General Report was due on December 7, 2006 and should cover the reporting period from October 19, 2006 to November 27, 2006 or from October 1, 2006 through November 27, 2006, if the 12 Day Pre-General Report was not required.

The committees appearing on the 12 Day Pre-General Report list either filed late or failed to file the report prior to four (4) days before the General Election (considered a non-filed report). The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report more than five (5) days after the due date or

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filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. 111.43, these committees should be assessed the civil money penalties included on the attached lists.

As noted above, the 12 Day Pre-General Report circulation list includes unauthorized committees filing quarterly that failed to file or failed to timely file the 12 Day Pre-General Report. Unlike unauthorized committees that file on a monthly basis, a quarterly filer need only file this report if it made general election contributions or expenditures between the dates of October 1, 2006 and October 18, 2006. In order to accurately identify the committees for administrative fines purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12 Day Pre-General Report (12 Day Report) submitted by an unauthorized quarterly filer was reviewed to ensure that it disclosed general election contributions or expenditures made during the coverage dates of the report. Any report meeting this definition that was filed late is included in the list. Any report not disclosing general election contributions or expenditures during this period is not included in the list, as it is not a required filing.
- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2006 through November 27, 2006 (58 days), was reviewed for activity which would have required the filing of a 12 Day Pre-General Report. If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 31% (18 days (12G Filing Period)/58 days (30G Filing Period)).
- If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will appear on both lists and will be assessed a fine for both the 12 Day and 30 Day Reports based on the estimated levels of activity described above.

Recommendation

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Reports 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 Reports.
2. Send the appropriate letters.

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2006 PRE-GENERAL Election Sensitive 10/26/2006 UNAUTH_Q

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1604	C00169508	AAI CORPORATION POLITICAL ACTION COMMITTEE	RICHARD F. CHRIST	\$196,951	1	11/5/2006	Not Filed	\$7,500	\$750
1605	C00366385	ADVANCED AGOUSTIC CONCEPTS INC POLITICAL ACTION COMMITTEE	SCOTT WILLIAMS	\$203,094	0	12/8/2006	Not Filed	\$3,599	\$500
1606	C00340356	ADVANCED MEDICAL TECHNOLOGY ASSOCIATION POLITICAL ACTION COMMITTEE	KENNETH MENDEZ	\$413,835	0	11/2/2006	7	\$2,000	\$120
1607	C00141242	AGRI-MARK INC LEGISLATIVE AND EDUCATIONAL COMMITTEE (ALEC)	HAROLD LARRABEE	\$106,244	1	12/15/2006	Not Filed	\$2,000	\$625
1608	C00325159	AIRTRAN AIRWAYS INC POLITICAL ACTION COMMITTEE	STANLEY GADEK	\$143,814	0	1/15/2007	Not Filed	\$7,129	\$600
1609	C00352054	ARMENIAN/AMERICAN PAC (ARMENPAC)	DR. SARKIS KECHEJIAN	\$281,080	0	12/3/2006	Not Filed	\$5,577	\$600
1610	C00363382	AVAYA INCORPORATED POLITICAL ACTION COMMITTEE	CHARLES E. CROWDERS	\$143,681	0	12/8/2006	Not Filed	\$3,350	\$500
1611	C00204388	BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC)	IRA LAMEL	\$189,003	2	11/2/2006	7	\$6,000	\$255
1612	C00078287	CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT	KAREN MELCHERT	\$345,872	0	12/12/2006	Not Filed	\$26,149	\$1,400

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1613	C00304832	CONSTELLATION BRANDS INC POLITICAL ACTION COMMITTEE	PERRY HUMPHREY	\$372,102	1	11/6/2006	Not Filed	\$7,554	\$750
1614	C00303818	COUNCIL FOR AFFORDABLE AND RURAL HOUSING PAC INC (CARH PAC)	TRAVIS A. MILLER	\$100,735	0	12/29/2006	Not Filed	\$1,457	\$500
1615	C00160630	DRUMMOND COMPANY INC POLITICAL ACTION COMMITTEE (DPAC)	MR SCOTT O STANFIELD	\$128,650	0	11/1/2006	6	\$8,500	\$160
1616	C00135855	ENERGEN CORPORATION POLITICAL ACTION COMMITTEE F/K/A ALAGASCO INC PAC	MR. DUDLEY REYNOLDS	\$171,512	0	11/8/2006	Not Filed	\$13,000	\$900
1617	C00366070	FAA MANAGERS ASSOCIATION INC PAC	MR LOUIS H DUPART	\$364,004	0	12/6/2006	Not Filed	\$8,369	\$600
1618	C00400242	FLORIDA FOR AMERICAS FUTURE PAC	HUGH WESTBROOK	\$112,600	0	12/6/2006	Not Filed	\$24,200	\$900
1619	C00349639	FLORIDA PBA INC FRIENDS OF LAW ENFORCEMENT	DAVID BRUCE MURRELL	\$112,445	0	12/7/2006	Not Filed	\$10,161	\$900
1620	C00012328	FLORIDA SUGAR CANE LEAGUE PAC	RYAN WESTON	\$385,029	0	12/6/2006	Not Filed	\$1,000	\$500
1621	C00242040	FOREST LANDOWNERS ASSOCIATION, INC. POLITICAL ACTION COMMITTEE	SCOTT JONES	\$145,222	0	12/21/2006	Not Filed	\$2,852	\$500
1622	C00297531	GOVERNMENT IS NOT GOD	NANCY M. MURRAY	\$133,277	0	11/8/2006	Not Filed	\$10,769	\$900
1623	C00338848	HOOSIER POLITICAL ACTION COMMITTEE (HOOSIER PAC)	GILEAD KAPEN	\$516,237	1	11/30/2006	Not Filed	\$37,000	\$1,750
1624	C00303073	INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC)	J. MICHAEL CRYE	\$317,704	0	12/7/2006	Not Filed	\$6,000	\$600

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1625	C00212142	KIRKLAND	STEPHEN TOMLINSON	\$208,482	0	12/5/2006	Not Filed	\$1,333	\$500
1626	C00284810	MARRIOTT INTERNATIONAL, INC. POLITICAL ACTION COMMITTEE	MS. MELISSA FROELICH	\$303,418	0	12/6/2007	Not Filed	\$31,748	\$1,400
1627	C00413575	MWW GROUP INC POLITICAL ACTION COMMITTEE THE	SETH ROSENSTEIN	\$115,565	0	11/22/2006	Not Filed	\$5,305	\$600
1628	C00296657	OHIO FINANCIAL SERVICES POLITICAL ACTION COMMITTEE	MR. JOSEPH R. SANDER	\$127,643	0	11/6/2006	Not Filed	\$9,773	\$600
1629	C00383489	PUBLIC SERVICE ENTERPRISE GROUP INC. POLITICAL ACTION COMMITTEE (PEGPAC)	MR. MARK G. KAHRER	\$217,457	0	11/21/2006	Not Filed	\$13,068	\$900
1630	C00363812	RECREATIONAL FISHING ALLIANCE, PAC	SCHNELLER A. STACEY	\$156,919	0	12/8/2006	Not Filed	\$13,184	\$900
1631	C00407130	REHAB CARE GROUP INC PAC	MARK ANTHONY BOGOVICH	\$129,589	0	12/7/2006	Not Filed	\$3,567	\$500
1632	C00345132	REPUBLICAN JEWISH COALITION-POLITICAL ACTION COMMITTEE (RJC-PAC)	MATTHEW BROOKS	\$304,333	0	12/8/2006	Not Filed	\$32,000	\$1,400
1633	C00368696	RESPONSIBILITY AND FREEDOM WORK PAC (REWPA)	JOHN P. NAIL	\$105,727	0	11/2/2007	Not Filed	\$4,115	\$500
1634	C00411611	SECURE PAC	LONDON THOMPSON	\$101,961	0	12/7/2006	Not Filed	\$57,015	\$3,000
1635	C00402669	SI INTERNATIONAL INC POLITICAL ACTION COMMITTEE	THOMAS E. DUINN	\$183,625	0	12/4/2006	Not Filed	\$6,370	\$600
1636	C00392621	SNOW PAC	STANLEY R. DE WAAL	\$534,667	0	12/8/2006	Not Filed	\$33,367	\$1,400

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1637	C00381459	SOCIETY FOR VASCULAR SURGERY-POLITICAL ACTION COMMITTEE	REBECCA MARON	\$169,667	0	11/30/2006	Not Filed	\$2,351	\$500
1638	C00359984	SOUTHEAST MILK INC POLITICAL ACTION COMMITTEE	CHARLES GARRISON	\$101,623	0	12/7/2006	Not Filed	\$7,000	\$600
1639	C00417576	TERRIPAC	BRIAN SCHIAVO	\$115,452	1	11/1/2006	6	\$9,615	\$137
1640	C00173419	UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POLED	JAMES REED	\$1,103,402	0	11/1/2006	6	\$24,696	\$210
1641	C00390575	WELLCARE HEALTH PLANS, INC PAC (WELLCARE PAC)	DAVID K SMITH	\$150,163	0	12/5/2006	Not Filed	\$17,500	\$900

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Federal Election Commission
Reason to Believe Circulation Report
2006 POST-GENERAL Non Election Sensitive 12/07/2006 UNAUTH & AUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1642	C00325159	AIRTRAN AIRWAYS INC POLITICAL ACTION COMMITTEE		STANLEY GADEK	\$148,703	0	1/15/2007	Not Filed	\$4,889	\$250
1643	C00396028	AL GREEN FOR CONGRESS	GREEN, ALEXANDER	WILLIAM LAWSON	\$747,829	3	1/12/2007	Not Filed	\$148,867	\$7875
1644	C00416404	ARCH LEADERSHIP PAC		JOHN ROSS TRUMAN	\$133,843	0		Not Filed	\$48,281 (est)	\$900
1645	C00427617	BLUE AMERICA PAC		HOWARD KLEIN	\$110,155	0	1/23/2007	Not Filed	\$58,689	\$270
1646	C00174847	BREWERY SOFT DRINK BEER DISTR OPTICAL DENTAL MISC WORKERS WAREHOUSEMAN HELP LOCAL 830 PAC		DANIEL H. GRACE	\$360,351	1	1/5/2007	29	\$40,003	\$975
1647	C00423335	BYRNE FOR CONGRESS COMMITTEE THE	BYRNE, MARK	JILL K HUEY	\$173,413	0	3/14/2007	Not Filed	\$36,327	\$900
1648	C00419143	CHAD KLUKO FOR CONGRESS COMMITTEE	KLUKO, CHAD	MARK KLUKO	\$176,646	0		Not Filed	\$35,328 (est)	\$900
1649	C00421693	CHRISTIAN BURRIDGE FOR CONGRESS	BURRIDGE, CHRISTIAN	DANIEL CARR	\$130,908	0	2/21/2007	Not Filed	\$28,919	\$900
1650	C00415604	CITIZENS FOR ACTION		NANCY T. KANJORSKI	\$305,153	0	1/10/2007	Not Filed	\$40,281	\$900
1651	C00062224	CLOROX COMPANY EMPLOYEES POLITICAL ACTION COMMITTEE THE		VICTORIA JONES	\$112,106	0	1/9/2007	Not Filed	\$4,436	\$250
1652	C00416321	COMMITTEE TO ELECT BRAD BLANTON	BLANTON, BRAD	JUSTIN BURCHARD	\$112,351	0		Not Filed	\$22,470 (est)	\$500
1653	C00426783	COMMITTEE TO ELECT RICK TRENT THE	TRENT, RICK LYNN	LISA JO TRENT	\$157,095	0	12/13/2006	6	\$26,805	\$320
1654	C00394692	COMMITTEE TO ELECT WILLIAM (WILLIE) VADEN FOR CONGRESS	VADEN, WILLIAM ROSS	WILLIAM ROSS VADEN	\$244,212	1		Not Filed	\$27,135	\$1,125
1655	C00125534	COMPOSITION ROOFERS LOCAL UNION #30 POLITICAL ACTION & EDUCATION FUND		TOM PEDRICK	\$433,371	0	1/21/2007	26	\$62,963	\$2,250

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1656	C0011237	COMPRESSED AIR FREE AIR FOUNDATION TUNNEL CAISSON SUBWAY WORKERS POLITICAL ACTION FUND		RICHARD E. FITZSIMMONS	\$133,149	0	1/11/2007	Not Filed	\$28,574	\$900
1657	C00379834	CONTRA COSTA UNITED DEMOCRATIC CAMPAIGN AKA CCUDC		GREGORY E. SANBORN	\$139,379	1	2/28/2007	Not Filed	\$24,388	\$625
1658	C00387555	COUNCIL FOR A LIVABLE WORLD CANDIDATE FUND		JOHN D. ISAACS	\$516,010	0	12/13/2006	6	\$76,052	\$1,000
1659	C00303818	COUNCIL FOR AFFORDABLE AND RURAL HOUSING PAC INC (CARH PAC)		TRAVISIA MILLER	\$103,976	0	12/29/2006	22	\$3,243	\$135
1660	C00369801	DAVID SCOTT FOR CONGRESS	SCOTT, DAVID ALBERT	HANK AARON	\$2,595,854	0	12/16/2006	9	\$435,592	\$3,800
1661	C00242040	FOREST LANDOWNERS ASSOCIATION INC POLITICAL ACTION COMMITTEE		SCOTT JONES	\$151,570	0	12/21/2006	14	\$6,348	\$120
1663	C00131557	HEARTLAND PAC		DAVID B. ORLEAN	\$140,402	0	1/5/2007	29	\$63,249	\$2,475
1664	C00411512	KANNO FOR CONGRESS	KANNO, JOHN	LEE NEVES	\$294,209	0		Not Filed	\$36,776 (est)	\$900
1665	C00265603	KERN COUNTY REPUBLICAN CENTRAL COMMITTEE		CRAIG HENDERSON	\$590,830	1	12/16/2006	11	\$14,708	\$193
1666	C00428615	LAKE COUNTY DEMOCRATIC PARTY FEDERAL COMMITTEE		PETER A. COUVALL	\$585,876	0	1/4/2007	28	\$189,533	\$5,000
1667	C00420091	MAATTA FOR CONGRESS CAMPAIGN COMMITTEE		DEBRA C. MAATTA	\$194,712	3		Not Filed	\$64,904 (est)	\$4,725
1668	C00003111	MAINE REPUBLICAN PARTY		PHILIP ROY, JR.	\$961,378	0	12/20/2006	13	\$26,507	\$460
1669	C00416131	MIDWEST VALUES PAC (MVP)		THOMAS BORMAN	\$219,927	0	1/11/2007	26	\$354,447	\$9,000
1670	C00424077	MIKE MCGRAW FOR CONGRESS	MCGRAW, MICHAEL EDWARD	A ROBERT MUZIO	\$131,898	0	1/29/2007	Not Filed	\$28,452	\$900
1671	C00174854	MONTANA CREDIT UNIONS LEAGUE POLITICAL ACTION COMMITTEE		JERRY W. GUSTAFSON	\$184,776	0	1/29/2007	Not Filed	\$6,396	\$300

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1673	C00369884	MZM-INC-PAC		MS JEANNIE ONEIL	\$178,705	0		Not Filed	\$36,741 (est)	\$900
1674	C00188987	NATIONAL ASSOCIATION FOR HOME CARE POLITICAL ACTION COMMITTEE		MICHAEL N. WOODS	\$137,626	2	1/11/2007	Not Filed	\$1,357	\$375
1675	C00012211	NORTH CAROLINA DENTAL PAC		AARON TROPMANN	\$124,000	0	1/6/2007	30	\$240	\$175
1676	C00416511	PENNSYLVANIA PAC FOR PROGRESS		JONATHAN ROBERT KING	\$149,370	0		Not Filed	\$37,679 (est)	\$900
1677	C00266536	PHILLIPS INTERNATIONAL INC POLITICAL ACTION COMMITTEE		MR WILLIAM ESTEV	\$230,502	0		Not Filed	\$46,300 (est)	\$900
1678	C00025395	PNM RESPONSIBLE CITIZENS GROUP		JOHN R. LOYACK	\$101,173	0	12/18/2006	11	\$5,097	\$105
1679	C00368696	RESPONSIBILITY AND FREEDOM WORK-PAC (REWPAAC)		JOHN P. NAIL	\$141,142	0	1/16/2007	Not Filed	\$35,415	\$900
1680	C00409359	SAN MATEO COUNTY DEMOCRATIC CENTRAL COMMITTEE		JUDITH A. CHRISTENSEN	\$160,523	0		Not Filed	\$12,832 (est)	\$500
1681	C00278788	SUFF CO DETECTIVES ASSN INC POLITICAL ACTION COMMITTEE		RAYMOND L GRIFFIN JR	\$150,036	0	12/2/2007	Not Filed	\$21,496	\$500
1683	C00178541	TEAMSTERS JOINT COUNCIL 53 POLITICAL ACTION COMMITTEE		PAUL CARBUJELLO	\$288,780	0	1/12/2007	Not Filed	\$50,002	\$2,700
1684	C00009357	THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE		MITCH GLAZIER	\$323,689	0	12/14/2006	7	\$12,000	\$135
1685	C00414417	TOM BARLOW FOR CONGRESS '06	BARLOW THOMAS J III	SHIRLEY J BARLOW	\$240,749	0	12/14/2006	7	\$86,118	\$1,100
1687	C00173419	UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POLED		JAMES REED	\$1,178,532	0	12/29/2006	22	\$75,121	\$2,600

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1688	C00063586	UNITED STATES BEET SUGAR ASSOCIATION POLITICAL ACTION COMMITTEE		JAMES JOHNSON	\$154,516	0	1/25/2007	Not Filed	\$1,000	\$250
1689	C00422139	VOLE GRIFFITH	GRIFFITH, WILSON	JEAN GRIFFITH	\$169,270	0	12/26/2006	19	\$35,907	\$580
1690	C00421628	WEGNER FOR CONGRESS	WEGNER, KENNETH ALEXANDER	KENNETH WEGNER	\$192,120	1	3/28/2007	Not Filed	\$23,586	\$625
1691	C00419614	WILSON AURBACH FOR CONGRESS COMMITTEE	AURBACH, WILSON	JORDAN WAEDREP	\$147,275	0	1/23/2007	Not Filed	\$8,065	\$300
1693	C00421131	ZANZI FOR CONGRESS	ZANZI, ITALO ANDRES	RYAN ADRIAN MOREIN	\$656,819	0	12/18/2006	17	\$109,643	\$2,46



FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Thursday, April 5, 2007 11:00

BALLOT DEADLINE: Tuesday, April 10, 2007 4:00

COMMISSIONER: LENHARD, MASON, von SPAKOVSKY, WALTHER, WEINTRAUB

SUBJECT: RTB Recommendation – 2006 12 Day Pre-General
(Quarterly Filers) and 30 Day Post-General Report For
The Administrative Fine Program. Memorandum from the
Assistant Staff Director, Reports Analysis Division
dated April 4, 2007.

() I approve the recommendation(s)

() I object to the recommendation(s)

() I approve the recommendations except those following
to which I object (please insert AF#)

() I approve the recommendations except those following
in which I abstain (please insert AF#)

() I approve the recommendations except those following
in which I am recused (please insert AF#)

() I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return
ONLY THE BALLOT to the Commission Secretary. Please return ballot no later
than date and time shown above.

DATE: _____

SIGNATURE: _____

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 12)
Day Pre-General (Quarterly Filers) and 30)
Day Post-General Report For The)
Administrative Fine Program:)
ADVANCED MEDICAL TECHNOLOGY) AF# 1606
ASSOCIATION POLITICAL ACTION)
COMMITTEE, and Kenneth Mendez as)
treasurer;)
BI-COUNTY POLITICAL ACTION) AF# 1611
COMMITTEE (FKA SUFFOLK PAC), and)
IRA LAMEL as treasurer;)
DRUMMOND COMPANY INC.) AF# 1615
POLITICAL ACTION COMMITTEE)
(DPAC), and Stanfield, Scott O. Mr. as)
treasurer;)
TERRIPAC, and BRIAN SCHIAVO as) AF# 1639
treasurer;)
UNITED ASSN JOURNEYMEN &) AF# 1640
APPRENT OF PLUMB & PIPEFITTING)
IND LOCAL 322 COMM FOR POL ED,)
and JAMES REED as treasurer;)
COUNCIL FOR AFFORDABLE AND) AF# 1614
RURAL HOUSING PAC INC (CARH)
PAC), and TRAVIS A MILLER as)
treasurer;)
FLORIDA FOR AMERICAS FUTURE) AF# 1618
PAC, and HUGH WESTBROOK as)
treasurer;)
SECURE PAC, and LONDON) AF# 1634
THOMPSON as treasurer;)
AAI CORPORATION POLITICAL) AF# 1604
ACTION COMMITTEE, and RICHARD F)
CHRIST as treasurer;)
ADVANCED ACOUSTIC CONCEPTS) AF# 1605
INC POLITICAL ACTION COMMITTEE,)
and SCOTT WILLIAMS as treasurer;)

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AGRI-MARK, INC LEGISLATIVE AND) AF# 1607
EDUCATIONAL COMMITTEE (ALEC),)
and HAROLD LARRABEE as treasurer;)
AIRTRAN AIRWAYS INC POLITICAL) AF# 1608
ACTION COMMITTEE, and Gadek,)
Stanley as treasurer;)
ARMENIAN AMERICAN PAC) AF# 1609
(ARMENPAC), and Kechejian, Sarkis Dr.)
as treasurer;)
AVAYA INCORPORATED POLITICAL) AF# 1610
ACTION COMMITTEE, and Crowders,)
Charles E. as treasurer;)
CNA FINANCIAL CORPORATION) AF# 1612
CITIZENS FOR GOOD GOVERNMENT,)
and KAREN MELCHERT as treasurer;)
CONSTELLATION BRANDS INC) AF# 1613
POLITICAL ACTION COMMITTEE, and)
PERRY HUMPHREY as treasurer;)
ENERGEN CORPORATION POLITICAL) AF# 1616
ACTION COMMITTEE F/K/A)
ALAGASCO INC PAC, and DUDLEY C)
REYNOLDS as treasurer;)
FAA MANAGERS ASSOCIATION INC.) AF# 1617
PAC, and Dupart, Louis H as treasurer;)
FLORIDA PBA INC FRIENDS OF LAW) AF# 1619
ENFORCEMENT, and DAVID BRUCE)
MURRELL as treasurer;)
FLORIDA SUGAR CANE LEAGUE PAC,) AF# 1620
and Ryan Weston as treasurer;)
FOREST LANDOWNERS) AF# 1621
ASSOCIATION INC. POLITICAL)
ACTION COMMITTEE, and Jones, Scott)
as treasurer;)
GOVERNMENT IS NOT GOD, and) AF# 1622
NANCY M MURRAY as treasurer;)
HOOSIER POLITICAL ACTION) AF# 1623
COMMITTEE (HOOSIER PAC), and)
GILEAD KAPEN as treasurer;)
INTERNATIONAL COUNCIL OF) AF# 1624
CRUISE LINES POLITICAL ACTION)
COMM (ICCL-PAC), and J MICHAEL)
CRYE as treasurer;)
KIRKLAND, and Tomlinson, Stephen as) AF# 1625
treasurer;)

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MARRIOTT INTERNATIONAL INC.) AF# 1626
POLITICAL ACTION COMMITTEE, and
Froehlich, Melissa Ms. as treasurer;
MWW GROUP INC POLITICAL ACTION) AF# 1627
COMMITTEE, THE, and SETH)
ROSENSTEIN as treasurer;)
OHIO FINANCIAL SERVICES) AF# 1628
POLITICAL ACTION COMMITTEE, and)
Sander, Joseph R Mr. as treasurer;)
PUBLIC SERVICE ENTERPRISE GROUP) AF# 1629
INC. POLITICAL ACTION COMMITTEE)
(PEGPAC), and G, Mark Mr. Kahrer as)
treasurer;)
RECREATIONAL FISHING ALLIANCE) AF# 1630
PAC, and Stacey, Schneller A as treasurer;)
REHABCARE GROUP INC PAC, and) AF# 1631
MARK ANTHONY BOGOVICH as)
treasurer;)
REPUBLICAN JEWISH COALITION-) AF# 1632
POLITICAL ACTION COMMITTEE)
(RJC-PAC), and Brooks, Matthew as)
treasurer;)
RESPONSIBILITY AND FREEDOM) AF# 1633
WORK PAC (RFPAC), and JOHN P)
NAIL as treasurer;)
SI INTERNATIONAL INC POLITICAL) AF# 1635
ACTION COMMITTEE, and Thomas E.)
Dunn as treasurer;)
SNOW PAC, and Stanley R. de Waal as) AF# 1636
treasurer;)
SOCIETY FOR VASCULAR SURGERY) AF# 1637
POLITICAL ACTION COMMITTEE, and)
REBECCA MARON as treasurer;)
SOUTHEAST MILK INC POLITICAL) AF# 1638
ACTION COMMITTEE, and CHARLES)
GARRISON as treasurer;)
WELLCARE HEALTH PLANS INC. PAC) AF# 1641
(WELLCARE PAC), and Smith, David K.)
as treasurer;)

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CORRECTED CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on April 10, 2007 the Commission took the following actions on the Reason To Believe Recommendation - 12 Day Pre-General (Quarterly Filers) and 30 Day Post-General Report For The Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated April 04, 2007, on the following committees:

AF#1606 Decided by a vote of 4-0 to: (1) find reason to believe that ADVANCED MEDICAL TECHNOLOGY ASSOCIATION POLITICAL ACTION COMMITTEE, and Kenneth Mendez 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1611 Decided by a vote of 4-0 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1615 Decided by a vote of 4-0 to: (1) find reason to believe that DRUMMOND COMPANY INC. POLITICAL ACTION COMMITTEE (DPAC), and Stanfield, Scott O. Mr. 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1639 Decided by a vote of 4-0 to: (1) find reason to believe that TERRIPAC, and BRIAN SCHIAVO 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1640 Decided by a vote of 4-0 to: (1) find reason to believe that UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POL ED, and JAMES REED as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount

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indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1614 Decided by a vote of 4-0 to: (1) find reason to believe that COUNCIL FOR AFFORDABLE AND RURAL HOUSING PAC INC (CARH PAC), and TRAVIS A MILLER 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1618 Decided by a vote of 4-0 to: (1) find reason to believe that FLORIDA FOR AMERICAS FUTURE PAC, and HUGH WESTBROOK 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1634 Decided by a vote of 4-0 to: (1) find reason to believe that SECURE PAC, and LONDON THOMPSON 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1604 Decided by a vote of 4-0 to: (1) find reason to believe that AAI CORPORATION POLITICAL ACTION COMMITTEE, and RICHARD F CHRIST 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1605 Decided by a vote of 4-0 to: (1) find reason to believe that ADVANCED ACOUSTIC CONCEPTS INC POLITICAL ACTION COMMITTEE, and SCOTT WILLIAMS 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1607 Decided by a vote of 4-0 to: (1) find reason to believe that AGRI-MARK, INC LEGISLATIVE AND EDUCATIONAL COMMITTEE (ALEC), and HAROLD LARRABEE 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

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AF#1608 Decided by a vote of 4-0 to: (1) find reason to believe that AIRTRAN AIRWAYS INC POLITICAL ACTION COMMITTEE, and Gadek, Stanley 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1609 Decided by a vote of 4-0 to: (1) find reason to believe that ARMENIAN AMERICAN PAC (ARMENPAC), and Kechejian, Sarkis Dr. 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1610 Decided by a vote of 4-0 to: (1) find reason to believe that AVAYA INCORPORATED POLITICAL ACTION COMMITTEE, and Crowders, Charles E. 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1612 Decided by a vote of 4-0 to: (1) find reason to believe that CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT, and KAREN MELCHERT 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1613 Decided by a vote of 4-0 to: (1) find reason to believe that CONSTELLATION BRANDS INC POLITICAL ACTION COMMITTEE, and PERRY HUMPHREY 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1616 Decided by a vote of 4-0 to: (1) find reason to believe that ENERGEN CORPORATION POLITICAL ACTION COMMITTEE F/K/A ALAGASCO INC PAC, and DUDLEY C REYNOLDS 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

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AF#1617 Decided by a vote of 4-0 to: (1) find reason to believe that FAA MANAGERS ASSOCIATION INC. PAC, and Dupart, Louis H 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1619 Decided by a vote of 4-0 to: (1) find reason to believe that FLORIDA PBA INC FRIENDS OF LAW ENFORCEMENT, and DAVID BRUCE MURRELL 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1620 Decided by a vote of 4-0 to: (1) find reason to believe that FLORIDA SUGAR CANE LEAGUE PAC, and Ryan Weston 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1621 Decided by a vote of 4-0 to: (1) find reason to believe that FOREST LANDOWNERS ASSOCIATION INC. POLITICAL ACTION COMMITTEE, and Jones, Scott 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1622 Decided by a vote of 4-0 to: (1) find reason to believe that GOVERNMENT IS NOT GOD, and NANCY M MURRAY 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1623 Decided by a vote of 4-0 to: (1) find reason to believe that HOOSIER POLITICAL ACTION COMMITTEE (HOOSIER PAC), and GILEAD KAPEN 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1624 Decided by a vote of 4-0 to: (1) find reason to believe that INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC), and J MICHAEL CRYE as treasurer violated 2 U.S.C. 434(a) and make a

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preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1625 Decided by a vote of 4-0 to: (1) find reason to believe that KIRKLAND, and Tomlinson, Stephen 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1626 Decided by a vote of 4-0 to: (1) find reason to believe that MARRIOTT INTERNATIONAL INC. POLITICAL ACTION COMMITTEE, and Froehlich, Melissa Ms. 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1627 Decided by a vote of 4-0 to: (1) find reason to believe that MWW GROUP INC POLITICAL ACTION COMMITTEE, THE, and SETH ROSENSTEIN 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1628 Decided by a vote of 4-0 to: (1) find reason to believe that OHIO FINANCIAL SERVICES POLITICAL ACTION COMMITTEE, and Sander, Joseph R. Mr. 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1629 Decided by a vote of 4-0 to: (1) find reason to believe that PUBLIC SERVICE ENTERPRISE GROUP INC. POLITICAL ACTION COMMITTEE (PEGPAC), and G, Mark Mr. Kahrer 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1630 Decided by a vote of 4-0 to: (1) find reason to believe that RECREATIONAL FISHING ALLIANCE PAC, and Stacey, Schneller A 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 letter.

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Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1631 Decided by a vote of 4-0 to: (1) find reason to believe that REHABCARE GROUP INC PAC, and MARK ANTHONY BOGOVICH 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1632 Decided by a vote of 4-0 to: (1) find reason to believe that REPUBLICAN JEWISH COALITION-POLITICAL ACTION COMMITTEE (RJC-PAC), and Brooks, Matthew 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1633 Decided by a vote of 4-0 to: (1) find reason to believe that RESPONSIBILITY AND FREEDOM WORK PAC (RFPAC), and JOHN P NAIL 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1635 Decided by a vote of 4-0 to: (1) find reason to believe that SI INTERNATIONAL INC POLITICAL ACTION COMMITTEE, and Thomas E. Dunn 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1636 Decided by a vote of 4-0 to: (1) find reason to believe that SNOW PAC, and Stanley R. de Waal 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1637 Decided by a vote of 4-0 to: (1) find reason to believe that SOCIETY FOR VASCULAR SURGERY POLITICAL ACTION COMMITTEE, and REBECCA MARON 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

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AF#1638 Decided by a vote of 4-0 to: (1) find reason to believe that SOUTHEAST MILK INC POLITICAL ACTION COMMITTEE, and CHARLES GARRISON 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1641 Decided by a vote of 4-0 to: (1) find reason to believe that WELLCARE HEALTH PLANS INC. PAC (WELLCARE PAC), and Smith, David K. 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 letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

Attest:

September 11, 2007
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 12, 2007

Louis H. Dupart
FAA Managers Association Inc. PAC
888 16th Street, N.W.
Suite 333
Washington, DC 20006

C00366070
AF#: 1617

Dear Louis H. Dupart:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12 Day Pre-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report is required if your committee makes a contribution to or expenditure on behalf of a candidate in the general election. This report, covering the period through 10/18/2006, shall be filed no later than 10/26/2006, 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 prior to four (4) days before the General Election held on 11/7/2006. You should file the 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 4/10/2007, the FEC found that there is reason to believe ("RTB") that FAA Managers Association Inc. PAC and you, as treasurer, violated 2 U.S.C. 434(a) by failing to file timely this report on or before 10/26/2006. 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 \$600. It is due by 5/20/2007 and is based on these factors:

Election Sensitivity of Report: Election Sensitive
Level of Activity: \$8,369
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 5/20/2007. 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

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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 FAA Managers Association Inc. PAC 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 Rhiannon Ryan 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,



Robert D. Lenhard
Chairman

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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 \$600 for the 2006 12 Day Pre-General 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 5/20/2007. 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: FAA Managers Association Inc. PAC

FEC ID#: C00366070

AF#: 1617

PAYMENT DUE DATE: 5/20/2007

PAYMENT AMOUNT DUE: \$600

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FAA Managers Association, Incorporated
#315 4410 Massachusetts Avenue NW
Washington, DC 20016
(703) 842-7406
www.FAAMA.org

We Know... We Care... We Deliver

May 16, 2007

Office of Administrative Review
Federal Election Commission
999 E Street, NW
Washington, DC 20463

C00366070
AF#: 1617

Reference: Appeal of the "reason to believe" determination and fine contained in a letter dated April 12, 2007

To Whom It May Concern:

In a letter dated April 12, 2007, the Federal Election Commission (FEC) notified me in my capacity as Treasurer of FAA Managers Association, Inc. PAC that the Committee had failed to file a 12 Day Pre-General Report of Receipts and Disbursements. The letter states the FAA Managers Association, Inc. PAC was previously notified and that I failed to timely file the report by October 26, 2006. As a result the FEC found on April 10, 2007 that there was reason to believe ("RTB") that the FAA Managers Inc. PAC and I violated 2 U.S.C. 434(a) by failing to timely file the 12 Day Pre-General Report on or before October 26, 2006.

I am respectfully requesting that you review the "reason to believe" determination in light of the specific factors below and to reverse your decision to levy a \$600 fine.

The FAA Managers Association, Inc. PAC registered with the FEC on April 30, 2001 and has never been fined by the FEC. We have worked diligently to file all of our records completely and on time. Whenever any issue regarding our filings has been brought to my attention, we have corrected them immediately, and I have directed my staff to make the appropriate filing. When in doubt about an issue, we have consulted with the FEC Staff to seek their guidance and help, which we did in this case.

In a letter dated December 21, 2006 referenced "Post-General Report 10/1/2006-10/10/2006", which is attached as document 1, John Gibson stated that the FAA Managers Association, Inc. PAC failed to file the Post-General Report. I did file the report on December 6, 2006. However, based on this letter -- that was received and opened on January 3, 2007 when our office re-opened after the Christmas Holidays -- I took immediate corrective action and filed an amended Post-General Report on January 3, 2007, which is attached as document 2. Because of the reference line, we filed a report to cover the period October 1 - November 27, 2006.

2007 MAY 21 A 7:59

APR 12 2007

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Nothing in the December 21, 2006 letter states that the FAA Managers Association, Inc. PAC had not filed a 12 Day Pre-General Report. Indeed, the letter is very confusing by including the dates 10/1/2006 – 10/10/2006 in the reference line of the letter. These dates do not pertain to any filing that I am required to make. Further, as you know, the 12 Day Pre-General Election Report covers the period from 10/1/2006 to 10/18/2006.

Neither the FAA Managers Association, Inc. PAC nor I was ever notified that we had failed to file the 12 Day Pre-General Report. Had I been notified in the December 21, 2006 letter that the Pre-General Report was missing, I would have taken immediate corrective action. In contrast, upon opening the December 21, 2006 where I learned that there was a problem with the Post-General Report, I immediately filed the amended report on January 3.

On January 11, 2007, my staff contacted Christopher Ritchie at the FEC to: (1) confirm the receipt of the January 3 amended filing for the Post General Report; and, (2), to ensure that we had completed all the filings required by the FEC. My staff, which was new in their position, called Mr. Ritchie because she wanted to be sure and double check that we had met all filing requirements at the FEC. Mr. Ritchie confirmed receipt of the report and told my staff that we are “all set from that point”. At no point during this conversation did Mr. Ritchie tell our staff that we had failed to file the “Pre-General Report” or that the January 3 amended filing covered the wrong dates. Please see document 3 for the hand written note from my staff after speaking with Mr. Ritchie.

The April 12, 2007 letter from the FEC, which was received in my office on April 16, came as a complete surprise. It states that I was “previously notified of the due date for this report”. I have never received any letter from the FEC notifying me that the 12 day Pre-General Report was required or that we had failed to file it. If I had received such a communication, I would have filed the report immediately.

Finally, upon receipt of the letter dated April 12, 2007, my office immediately contacted the Office of Administrative Review, speaking with Jill Sugarman. Ms. Sugarman said that a letter to contest the Reason to Believe finding could be written if we wanted to appeal the decision, but it would be best to speak to our own FEC analyst, Nisha Saspal, to obtain advice on what corrective actions needed to be taken to address the 12 Day Pre-General Report. My office contacted Ms. Saspal on April 16, 2007. Ms. Saspal told my staff to prepare the 12 Day Pre-General Report from 10/1-10/18/2006 and then amend and resubmit the Post-General Report to read the dates of 10/19-11/27/2006. These reports were filed with the FEC on April 17, 2007. This was the first time that we became aware that the Post-General Report had been filed for the wrong dates.



To ensure that this does not happen again, I have taken the following corrective action. One, both my staff and I have signed up for the FEC's course on June 4-5-- I am on the waiting list -- to ensure that we are all current on filing requirements. Two, I have instituted a two-step process to make sure that all filings are made on time. Three, I have separately asked that a second professional staff member review all filings to ensure compliance with Federal Election law.

In summary, as Treasurer of the FAA Managers Association, Inc. PAC, I diligently strive to follow all guidelines and filing requirements of the Federal Election Commission. I know that the responsibility to file correct reports lies with the FAA Managers Association, Inc. PAC and myself in the capacity of Treasurer. I have told my staff to seek help when in doubt to ensure that we comply fully with all filing requirements. Unfortunately, the December 21, 2006 letter was confusing and led to multiple amended reports that could have been avoided if it had clearly stated that the Pre-General Report was missing and the Post-General Report had incorrect dates. In good faith, after filing the January 3, 2007 amended report, we took the extra step to call the FEC to determine if we needed to undertake any other filings or remedial action. The answer that we were "all set" led my staff to believe that we had taken all of the action that was required.

In light of the foregoing information, which constitutes the extraordinary and factual errors that permit a reversal of your initial determination, I respectfully request that the "reason to believe" determination contained in the April 12 letter be vacated. Once again, I have personally taken comprehensive action to ensure that this does not happen again. I have worked diligently to rectify and file the appropriate reports, and sincerely hope that the FEC will reconsider the "Reason to Believe" determination and the calculated civil money penalty.

I thank you for your time and consideration in this matter.

Sincerely,

Louis H. Dupart
Treasurer
FAA Managers Association Inc. PAC
C0036070

28092620167



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 2006

RQ-7

LOUIS H. DUPART, TREASURER
FAA MANAGERS ASSOCIATION, INC. PAC
888 16TH STREET, NW SUITE 333
WASHINGTON, DC 20006

IDENTIFICATION NUMBER: C00366070

REFERENCE: POST-GENERAL REPORT 10/1/2006 - 10/10/2006

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS MUST ALSO BE FILED WITH THE SECRETARY OF THE STATE OR EQUIVALENT STATE OFFICER UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES. YOU CAN VERIFY THE COMMISSION'S RECEIPT OF ANY DOCUMENTS SUBMITTED BY YOUR COMMITTEE ON THE FEC WEBSITE AT WWW.FEC.GOV.

THE FAILURE TO TIMELY FILE THIS REPORT MAY RESULT IN CIVIL MONEY PENALTIES, AN AUDIT OR LEGAL ENFORCEMENT ACTION. THE CIVIL MONEY PENALTY CALCULATION FOR LATE REPORTS DOES NOT INCLUDE A GRACE PERIOD AND BEGINS ON THE DAY FOLLOWING THE DUE DATE FOR THE REPORT. DUE TO HEIGHTENED SECURITY SCREENING MEASURES, DELIVERY OF MAIL BY THE US POSTAL SERVICE MAY BE DELAYED. THE COMMISSION RECOMMENDS THAT YOU SUBMIT YOUR REPORT VIA OVERNIGHT DELIVERY OR COURIER SERVICE.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT CHRISTOPHER RITCHIE AT OUR TOLL FREE NUMBER (800)424-9530. OUR DIRECT LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION (RAD)

*talked to C. Ritchie on 1/11/07,
after amending report to read
correct dates; Ritchie said I
would be all set from that
point. RB*

28092620168

Document 1

Bourassa, Rachel

From: FEC Filing Server [http_db@sdrdc.com]
Sent: Wednesday, January 03, 2007 4:01 PM
To: Bourassa, Rachel
Subject: FEC Electronic Filing Results

DISCLOSE -- FEC Financial Disclosure Filing Acknowledgement

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 01/03/2007 - 16:00:57, and was assigned the Filing ID of: FEC-267034

Please make a note of this, as it will be necessary to refer to this information in the future.

Thank you for using DISCLOSE.

Do not reply to this notice. It is sent from an unattended account that cannot receive email.

For your reference, the output of the validation check was as follows:

FEC File Validator Version 5.3.1.1

Developed for the Federal Election Commission by NIC Technologies, Inc. 1996-2006

=== Identification Section =====

Committee ID: C00366070
Committee Name: FAA Managers Association Inc. PAC
Filing Type: F3XA
From/Through: 20061001 - 20061127

Software/Ver#: FECfile / Ver# 5.3.1.0(f16)

=== Results Section =====

>>----> FEC data file passed validation. <----<<<

Alert: 00002 warnings and/or potential missing information encountered

=== Summary Page Totals Section =====

Cover/Summary Page Totals for Form: F3X

Line No.	Column A	Column B
6A 2006		124,387.04
6B	80,203.04	
6C	15,996.00	41,812.00
6D	96,199.04	166,199.04
7	11,000.00	81,000.00
8	85,199.04	85,199.04
9	0.00	
10	0.00	
11A1	4,490.00	6,170.00
11A2	11,506.00	35,642.00

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Document 2

28092620170

11A3	15,996.00	41,812.00
11B	0.00	0.00
11C	0.00	0.00
11D	15,996.00	41,812.00
12	0.00	0.00
13	0.00	0.00
14	0.00	0.00
15	0.00	0.00
16	0.00	0.00
17	0.00	0.00
18A	0.00	0.00
19	15,996.00	41,812.00
20	15,996.00	41,812.00
21A1	0.00	0.00
21A2	0.00	0.00
21B	0.00	0.00
21C	0.00	0.00
22	0.00	0.00
23	11,000.00	81,000.00
24	0.00	0.00
25	0.00	0.00
26	0.00	0.00
27	0.00	0.00
28A	0.00	0.00
28B	0.00	0.00
28C	0.00	0.00
28D	0.00	0.00
29	0.00	0.00
31	11,000.00	81,000.00
32	11,000.00	81,000.00
33	15,996.00	41,812.00
34	0.00	0.00
35	15,996.00	41,812.00
36	0.00	0.00
37	0.00	0.00
38	0.00	0.00
18B	0.00	0.00
18C	0.00	0.00
30A1	0.00	0.00
30A2	0.00	0.00
30B	0.00	0.00
30C	0.00	0.00

=== Errors & Warnings Section =====

Validation Errors & Warnings

ERROR (Level 16, 12, 8) Messages...

No Errors

WARNING (Level 4) Messages...

Form{Item}: SB23 {FRIENDS OF THE BIG SKY}
Field Name: #019 Candidate: Office Sought
Warning Conditionally Required field is Empty

Form{Item}: SB23 {OHIO'S 17 STAR PAC}
Field Name: #019 Candidate: Office Sought
Warning Conditionally Required field is Empty

MD5 checksum:
4035b3108979f881769494c419a3c9bf

28092620171



FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

FILING FEC-267034

1. FAA Managers Association Inc. PAC

888 16th Street NW
Suite 333
Washington, DC 20006

2. FEC Committee ID #: C00366070

3. This committee HAS qualified as a multicandidate committee (see FEC Form 1M)

4. Report Type = POST-GENERAL

For election on 11/07/2006 in the State of DC

This IS an amended REPORT

Filed: 01/03/2007

SUMMARY PAGE

DETAILED SUMMARY PAGE

Schedule A Filings (ITEMIZED RECEIPTS)

Schedule B Filings (ITEMIZED DISBURSEMENTS)

SUMMARY PAGE

5. Covering Period 10/01/2006 Through 11/27/2006

	Column A	Column B
--	----------	----------

28092620172

	This Period	Year To Date
6. (a) Cash on hand, January 1, 2006		124387.04
(b) Cash on hand at Beginning of Reporting Period	80203.04	
(c) Total Receipts (from line 19)	15996.00	41812.00
(d) Subtotal (6(b) + 6(c) for A, 6(a) + 6(c) for B)	96199.04	166199.04
7. Total Disbursements	11000.00	81000.00
8. Cash on Hand at Close of Reporting Period	85199.04	85199.04
9. Debts and Obligations Owed TO the Committee	0.00	
Itemize all on SCHEDULE C or SCHEDULE D		
10. Debts and Obligations Owed BY the Committee	0.00	
Itemize all on SCHEDULE C or SCHEDULE D		

Treasurer: Mr. Louis H Dupart

Date Signed: 01/03/2007

(End Summary Page, FEC FORM 3X)

DETAILED SUMMARY PAGE

Of Receipts And Disbursements

	Column A This Period	Column B Calendar Year
I. Receipts		
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other than Political Committees		
(i) Itemized	4490.00	6170.00
(ii) Unitemized	11506.00	35642.00
(iii) Total (11(a)(i) + 11(a)(ii))	15996.00	41812.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACS)	0.00	0.00
(d) Total Contributions (11(a)(iii) + (b) + (c))	15996.00	41812.00
12. Transfers From Affiliated/Other Party Committees	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets to Operating Expenditures (Refunds, Rebates, etc)	0.00	0.00
16. Refunds of Contributions made to Fed. Candidates and other Political Committees	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc)	0.00	0.00

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18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (SCHEDULE H3)	0.00	0.00
(b) Levin Funds (SCHEDULE H5)	0.00	0.00
(c) Total Transfers (18(a) + 18(b))	0.00	0.00
19. Total Receipts (11(d) + 12 + 13 + 14 + 15 + 16 + 17 + 18)	15996.00	41812.00
20. Total Federal Receipts (19 - 18(c))	15996.00	41812.00
II. Disbursements		
21. Operating Expenditures		
(a) Shared Federal/Nonfederal Activity (SCHEDULE H4)		
(i) Federal Share	0.00	0.00
(ii) Nonfederal Share	0.00	0.00
(b) Other Federal Operating Expenditures	0.00	0.00
(c) Total Operating Expenditures (21(a)(i) + (a)(ii) + (b))	0.00	0.00
22. Transfers to Affiliated/Other Party Committees	0.00	0.00
23. Contributions to Fed. Candidates/Committees and Other Political Committees	11000.00	81000.00
24. Independent Expenditures (SCHEDULE E)	0.00	0.00
25. Coordinated Expenditures Made by Party Committees (SCHEDULE F)	0.00	0.00
26. Loan Repayments Made	0.00	0.00
27. Loans Made	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs)	0.00	0.00
(d) Total Contribution Refunds (28(a) + (b) + (c))	0.00	0.00
29. Other Disbursements	0.00	0.00
30. Federal Election Activity		
(a) (i) Allocated Federal Election Activity - Federal Share (SCHEDULE H6)	0.00	0.00
(a) (ii) Allocated Federal Election Activity - Levin Share (SCHEDULE H6)	0.00	0.00
(b) Federal Election Activity Paid Entirely with Federal Funds	0.00	0.00
(c) Total Federal Election Activity (30(a)(i)+30(a)(ii)+30(b))	0.00	0.00
31. Total Disbursements (21(c)+23+24+25+26+27+28(d)+29+30(c))	11000.00	81000.00
32. Total Federal Disbursements (31-21(a)(ii)-30(a)(ii))	11000.00	81000.00
III. Net Contributions/Operating Expenditures		
32. Total Contributions (other than loans) (11(d))	15996.00	41812.00
33. Total Contribution Refunds (28(d))	0.00	0.00
34. Net Contributions (other than loans) (32 - 33)	15996.00	41812.00
35. Total Federal Operating Expenditures (21(a)(i) + 21(b))	0.00	0.00
36. Offsets to Operating Expenditures (15)	0.00	0.00
37. Net Operating Expenditures	0.00	0.00

(End Detailed Summary Page, FEC FORM 3X)



Generated Thu May 10 14:59:45 2007

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SCHEDULE A

ITEMIZED RECEIPTS All Listed Line Numbers

Committee: FAA MANAGERS ASSOCIATION INC. PAC

Contributor's Name Contributor's Address	Employer	Date	Amount (\$)
	Occupation	Memo	Aggregate (\$)
	Memo/Description	Text	Limits
Harold A Albert 39320 Tollhouse Road Lovettsville, Virginia 20180	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
David H Alford 19309 Moon Drive Tehachapi, California 93561	FAA Managers Association	11/20/2006	100.00
	Supervisor		275.00
	Biweekly payroll deduction		
Alexander Appelhans, Jr. 2254 Smallwood Drive Ft. Collins, Colorado 805258521	FAA Managers Association	11/20/2006	100.00
	Supervisor		275.00
	Biweekly payroll deduction		
Michael A Astorino 177 Castaway Trail Moorseville, North Carolina 28115	FAA Managers Association	11/20/2006	100.00
	Supervisor		275.00
	Biweekly payroll deduction		
Bert J Barnett 9460 Live Oak Place #104 Ft. Lauderdale, Florida 33324	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
Pamela Burger 9175 Kearny Villa Road San Diego, California 92126	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
John J Callahan, Jr.	FAA Managers Association	11/20/2006	110.00

38905 Bear Creek Grafton, Ohio 44044	Supervisor		225.00
	Biweekly payroll deduction		
Randy W Carlson 12979 North 66th Street Longmont, Colorado 80503	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
Marianna M Carnes 15507 Darrow Road Vermilion, Ohio 44089	FAA Managers Association	11/20/2006	110.00
	Supervisor		215.00
	Biweekly payroll deduction		
William R Carver 1300 Edmondson Avenue Catonsville, Maryland 21228	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
Robert M Clyburn 2341 Dogwood Trail Germantown, Tennessee 38139	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
David S Conley 1208 Elwood Road Hammonton, New Jersey 08037	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
James Coschignano, Jr. 154 Old Country Road Melville, New York 11747	FAA Managers Association	11/20/2006	200.00
	Supervisor		550.00
	Biweekly payroll deduction		
Daniel R Cunningham 4600 Alexander Valley Dr. Apt 202 Charlotte, North Carolina 28270	FAA Managers Association	11/20/2006	100.00
	Supervisor		275.00
	Biweekly payroll deduction		
Donald D Fedorowicz 915 Welch Ave. Berthoud, Colorado 80513	FAA Managers Association	11/20/2006	130.00
	Supervisor		340.00
	Biweekly payroll deduction		
Robert A Fletcher 21122 East Mineral Drive Aurora, Colorado 800161926	FAA Managers Association	11/20/2006	100.00
	Supervisor		275.00
	Biweekly payroll deduction		
Philip C Freed 3205 East Gemini Court Chandler, Arizona 85249	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
Carmine W Gallo 3147 William St Wantagh, New York 11793	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
Kari M Gonter 23810 Green Haven Lane Ramona, California 92065	FAA Managers Association	11/20/2006	80.00
	Supervisor		220.00
	Biweekly payroll deduction		
Cindy J Greene	FAA Managers Association	11/20/2006	100.00

20914 June Court Lakeville, Minnesota 55044	Supervisor		275.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	80.00
Kevin D Haines 2972 Robyn Dr. North Pole, Alaska 99705	Supervisor		220.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	180.00
Robert P Hildebidle 237 NW 89th Ave. Coral Springs, Florida 33071	Supervisor		460.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	80.00
Judy A Holcomb 304 E. Ponderosa Drive Tuttle, Oklahoma 73089	Supervisor		220.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	80.00
Michael J. Keyworth 4509 Lake Charles Dr. Corpus Christi, Texas 78713	Supervisor		220.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	80.00
Robert R Knight 17056 Elsinore Dr. Jacksonville, Florida 32226	Supervisor		220.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	80.00
Alan A Kwiatkowski 23453 Woodview Drive N. Olmstead, Ohio 44070	Supervisor		275.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	100.00
John A Lane 19938 War Admiral Road Eagle River, Alaska 99577	Supervisor		220.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	80.00
Anthony D Manzione 317 Ashbury Road Winchester, Virginia 22602	Supervisor		275.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	100.00
Rhonda T McCarthy 2470 Flippen Rd. Stockbridge, Georgia 302815162	Supervisor		220.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	80.00
Robert J McGrath, Jr. PO Box 1173 Fayetteville, Georgia 30215	Supervisor		220.00
	Biweekly payroll deduction		
	FAA Managers Association	11/20/2006	80.00
Daniel P Mullin 16 Lincoln Circle Ivyland, Pennsylvania 18974	Supervisor		220.00
	Biweekly payroll deduction		
	FAAMA Association	11/20/2006	80.00
Deborah A Omowale 2536 High Street Oakland, California 94601	Supervisor		220.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	80.00
Lori B Penwell	FAAMA	11/20/2006	80.00

9168 N Sacred Sky Pl. Marana, Arizona 85743	Supervisor		220.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	80.00
Mark G Phipps 13493 Falls Drive Broomfield, Colorado 800205186	Supervisor		220.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	80.00
Ellis L Powell PO Box 4145 Leesburg, Virginia 20177	Supervisor		220.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	100.00
Elizabeth L Ray 724 Chehaw Rd. Griffin, Georgia 302236710	Supervisor		240.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	80.00
Billy K Reed 3020 Old Abilene Ct W Mobie, Alabama 36605	Supervisor		220.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	90.00
Carey D Rolofson 13245 Timber Park Dr. Platte City, Montana 64079	Supervisor		230.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	100.00
John P Shisler 1554 Ramae Drive Loveland, Colorado 80537	Supervisor		275.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	100.00
John A Taylor 2404 SW 113 Terrace Oklahoma City, Oklahoma 73170	Supervisor		275.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	180.00
Ralph D Walters 3500 Cottonwood Circle Longmont, Colorado 80504	Supervisor		460.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	80.00
Mark D Ward 507 Morgan Ct Hampton, Georgia 30228	Supervisor		220.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	200.00
Terri Lynn Waterman 8025 NW 124th St Oklahoma City, Oklahoma 73142	Supervisor		550.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	120.00
Robert P Wheeler 1511 Highland Lakes Dr. Keller, Texas 76248	Supervisor		330.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	80.00
Jonathon W White 1710 Kingsway Oak Grove, Montana 64075	Supervisor		220.00
	Biweekly payroll deduction		
	FAAMA	11/20/2006	70.00
Kelley M Wilson			
	FAAMA	11/20/2006	70.00

39524 Denham Dr Palmdale, California 93551	Supervisor	210.00
Biweekly payroll deduction		

Total Donation Amount (Non-Memo)	
Total Memo Amount	
Number of Transactions (Non-Memo)	46
Number of Transactions (Memo)	0



Generated Thu May 10 15:00:51 2007

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SCHEDULE B

ITEMIZED DISBURSEMENTS All Listed Line Numbers

Committee: FAA MANAGERS ASSOCIATION INC. PAC

Disbursement To Address	Election Type	Date of Disbursement
	Extra Description	Amount This Period
	Text	Memo
FRIENDS OF CONRAD BURNS - 2006 PO BOX 1596 HELENA, Montana 59624		10/16/2006
		2500.00
FRIENDS OF THE BIG SKY PO Box 1497 Helena, Montana 59624		10/16/2006
		2500.00
OHIO'S 17 STAR PAC P.O. Box 340917 Columbus, Ohio 43234		10/12/2006
		5000.00
TEXANS FOR HENRY BONILLA P.O. Box 17292 San Antonio, Texas 78217		11/15/2006
		1000.00

Total Disbursement Amount (Non-Memo)	
Total Memo Amount	
Number of Transactions (Non-Memo)	4
Number of Transactions (Memo)	0



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28092620182



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 2006

RQ-7

LOUIS H. DUPART, TREASURER
FAA MANAGERS ASSOCIATION, INC. PAC
888 16TH STREET, NW SUITE 333
WASHINGTON, DC 20006

IDENTIFICATION NUMBER: C00366070

REFERENCE: POST-GENERAL REPORT 10/1/2006 - 10/10/2006

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS MUST ALSO BE FILED WITH THE SECRETARY OF THE STATE OR EQUIVALENT STATE OFFICER UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES. YOU CAN VERIFY THE COMMISSION'S RECEIPT OF ANY DOCUMENTS SUBMITTED BY YOUR COMMITTEE ON THE FEC WEBSITE AT WWW.FEC.GOV.

THE FAILURE TO TIMELY FILE THIS REPORT MAY RESULT IN CIVIL MONEY PENALTIES, AN AUDIT OR LEGAL ENFORCEMENT ACTION. THE CIVIL MONEY PENALTY CALCULATION FOR LATE REPORTS DOES NOT INCLUDE A GRACE PERIOD AND BEGINS ON THE DAY FOLLOWING THE DUE DATE FOR THE REPORT. DUE TO HEIGHTENED SECURITY SCREENING MEASURES, DELIVERY OF MAIL BY THE US POSTAL SERVICE MAY BE DELAYED. THE COMMISSION RECOMMENDS THAT YOU SUBMIT YOUR REPORT VIA OVERNIGHT DELIVERY OR COURIER SERVICE.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT CHRISTOPHER RITCHIE AT OUR TOLL FREE NUMBER (800)424-9530. OUR DIRECT LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION (RAD)

*talked to C. Ritchie on 1/11/07,
after amending report to read
correct dates; Ritchie said I
would be all set from that
point.
RB*

28092620183

Document 3



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Via First Class Mail

May 22, 2007

Louis H. Dupart, as Treasurer
FAA Managers Association Inc. PAC
888 16th Street, NW, Suite 333
Washington, DC 20006

C00366070
AF# 1617

Dear Mr. Dupart:

On May 21, 2007, the Commission received the written response ("challenge") which is being reviewed by the Office of Administrative Review. If you have any questions regarding the challenge, please contact this Office on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

Sincerely,

A handwritten signature in cursive script that reads "Jill Sugarman".

Jill Sugarman
Reviewing Analyst
Office of Administrative Review

28092620184

2007 MAY 29 A 10: 06

Date: May 29, 2007

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 1617

Committee Name: FAA Managers Association Inc. PAC

Committee ID#: C00366070

Committee Address (if different than in RTB letter):

Treasurer Name (if different than in RTB finding): N/A

Attachments:

Copy of RTB Circulation Report, dated April 4, 2007 and RTB Certification, dated April 10, 2007: Previously Forwarded

Attachment#: N/A

Certified Return Receipt (to be forwarded at later date if not yet received)(Y/N): Y

Attachment #: # 1

Original Correspondence Received by RAD in Response to RTB Letter (Y/N): N

Attachment #: N/A

RAD Staff Declaration (Y/N): Y

-2006 Pre-General Report Prior Notice, dated October 2, 2006.

-Non-Filer Letter, dated December 21, 2006.

-RTB Letter, dated April 12, 2007.


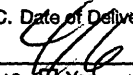
Attachment #: 3

Other RAD Information: (Y/N): N

Attachment#: N/A

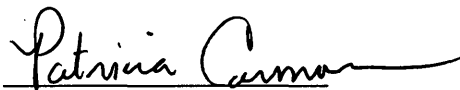
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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X </p>	
<p>1. Article Addressed to:</p> <p>MR. LOUIS H. DUPART FAA MANAGERS ASSOCIATION INC. PAC 888 16TH STREET N.W., SUITE 333 WASHINGTON, DC 20006</p>	<p>B. Received by (Printed Name)</p>	<p>C. Date of Delivery</p> <p></p>
	<p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2. Article Number: 7005 1820 0003 8239 6279</p> <p><i>(Transfer from service label)</i></p>		
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>		

DECLARATION OF PATRICIA CARMONA

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the research conducted with regard to the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to the FAA Managers Association Inc. PAC:
 - Prior Notice, dated October 2, 2006, referencing the 2006 Pre-General Report.
 - Non-Filer Letter, dated December 21, 2006, referencing the 2006 Post-General Report.
 - Reason-to-Believe Letter, dated April 12, 2007, referencing the 2006 Pre-General Report.
3. I hereby certify that I have searched the Commission's public records and find that the FAA Managers Association Inc. PAC filed the 2006 Pre-General Report with the Federal Election Commission on April 17, 2007.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and we have provided all relevant telecoms for the case. This declaration was executed at Washington, D.C. on the 29th day of May, 2007.



Patricia Carmona
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

28092620187

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

October 2, 2006

I. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 18

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
Pre-General ³	10/01/06 - 10/18/06	10/23/06	10/26/06
Post-General	10/19/06 - 11/27/06	12/07/06	12/07/06

II. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 18²

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
Post-General	10/01/06 - 11/27/06	12/07/06	12/07/06

WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 7 (the Pre-General Election Report). All Party Committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report). Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

Certain party committees are required to file monthly reports (quarterly reporting is no longer an option for these committees). For more information, see the January 2006 Record, which can be found on the FEC web site at www.fec.gov/pages/record.shtml.

METHOD OF FILING

Quarterly Reports sent by registered or certified mail must be postmarked by the mailing date (please note that a certificate of mailing is not an acceptable method). Committees should keep the mailing receipt with its postmark as proof of filing.

If using overnight mail, the delivery service must receive the report by the mailing date. "Overnight mail" includes Priority or Express Mail having a delivery confirmation, or an overnight delivery service with an on-line tracking system and scheduled for next business day delivery. Quarterly Reports filed by any other means must be received by the Commission (or Secretary of the Senate for committees supporting only Senate candidates) by the filing date.

¹These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Committees that made general election contributions or expenditures before October 1 and did not previously report them must also follow Chart I.

(over)

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48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with the general election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1 and October 18, 2006. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures in connection with the general election aggregating \$1,000 between October 19 and November 5, 2006. See 11 CFR 104.4. These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate.

QUARTERLY FILING SCHEDULE FOR REMAINDER OF 2006

REPORT	REPORTING PERIOD¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
Year-End	11/28/06 - 12/31/06	01/31/07	01/31/07

COMPLIANCE

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.
- Under the Administrative Fine Program, political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$16,000 (or more for repeat late-and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program" and visit the FEC web site at www.fec.gov/af.shtml.
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report (either by direct transmission or on 3.5" diskette) that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

ELECTRONIC FILING

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that have reason to expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled "Electronic Filing," call the FEC's Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at www.fec.gov/electfil/electron.shtml.

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from quarterly to monthly) who wish to do so must notify the Commission in writing when they file their next report due under their current reporting schedule. Electronic filers must file this request electronically. Committees may change their filing frequency no more than once per calendar year.

¹See footnote #1, on reverse side.

28092620189



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 2006

RQ-7

LOUIS H. DUPART, TREASURER
FAA MANAGERS ASSOCIATION, INC. PAC
888 16TH STREET, NW SUITE 333
WASHINGTON, DC 20006

IDENTIFICATION NUMBER: C00366070

REFERENCE: POST-GENERAL REPORT 10/1/2006 - 10/10/2006

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEDERAL ELECTION COMMISSION, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS MUST ALSO BE FILED WITH THE SECRETARY OF THE STATE OR EQUIVALENT STATE OFFICER UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES. YOU CAN VERIFY THE COMMISSION'S RECEIPT OF ANY DOCUMENTS SUBMITTED BY YOUR COMMITTEE ON THE FEC WEBSITE AT WWW.FEC.GOV.

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IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT CHRISTOPHER RITCHIE AT OUR TOLL FREE NUMBER (800)424-9530. OUR DIRECT LOCAL NUMBER IS (202)694-1130.

SINCERELY,

A handwritten signature in black ink, appearing to read "John D. Gibson".

JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION (RAD)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2007 OCT 25 A 11:03

October 25, 2007

MEMORANDUM

To: The Commission

Through: Patrina M. Clark *PMC*
Staff Director

From: John D. Gibson *JG*
Chief Compliance Officer

Shawn Woodhead Werth *SW*
Reviewing Officer
Office of Administrative Review

By: Jill I. Sugarman *JIS*
Reviewing Analyst

Subject: AF# 1617 – FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer (C00366070)

SENSITIVE

The respondents' challenge for this case was due May 20, 2007, after the April 30, 2007 effective date of the revised administrative fine regulations. The Office of General Counsel informed this Office that if the respondents' challenge is due after the April 30 effective date, the new rules apply. The Reviewing Officer's recommendation, therefore, is based on the new rules.

The attached Reviewing Officer recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment

28092620191



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 25, 2007

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 1617 – FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer
(C00366070)

On April 10, 2007, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2006 12 Day Pre-General Report, an election sensitive report, and made a preliminary determination that the civil money penalty was \$600 based on the schedule of penalties at 11 C.F.R. § 111.43. They were notified of the Commission's finding and RTB civil money penalty by the Reports Analysis Division ("RAD") on April 12, 2007.

Respondents' Response

On May 21, 2007, the Commission received the written response and supporting documentation ("challenge") from the Treasurer who says that he never received notification that the 12 Day Pre-General Report was required or that he failed to file it. On December 6, 2006, he filed the 30 Day Post-General Report. On December 21, RAD sent a letter for the Post-General Report citing the period from October 1 to 10. When he found out there was a problem with this report, he filed an amended report on January 3. RAD's letter did not mention the 12 Day Pre-General Report. If it had, he would have filed it immediately, and the Analyst neglected to bring it up on January 11 when his staff called to inquire if the filings were up-to-date.

Surprised by the April 12 RTB letter, staff contacted another RAD Analyst who confirmed that the 12 Day Pre-General Report needed to be filed, which they did on April 17, 2007. Since then, he has taken three corrective steps to prevent similar problems in the future. He asks that the RTB finding be vacated due to the ambiguous language in RAD's December 21 letter and the advice received from the Analyst on January 11, both of which constitute extraordinary and factual errors. Included with the challenge are copies of RAD's December letter with handwritten notes (Documents 1 and 3) along with the e-mailed confirmation receipt and summary data for the amended Post-General Report filed January 3, 2007 (Document 2).

Analysis

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee shall file a pre-election report which shall be filed no later than the 12th day before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii) and 11 C.F.R. § 104.5(c)(1)(ii). Reports filed electronically must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on October 26 to be timely filed.

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11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

All committees that choose to file on a quarterly schedule during an election year must file a 30 Day Post-General Report. These committees also have to file a 12 Day Pre-General Report if they make contributions or expenditures in connection with the General Election which have not been previously reported. Therefore, it is the responsibility of a quarterly filer's Treasurer to monitor the Committee's activity to determine if and when they must file the Pre-General Report in addition to the Post-General Report.

The respondents chose to file on a quarterly schedule in 2006, similar to 2002 and 2004. In 2002, Commission records show that they did not make contributions or expenditures in connection with the General Election during the Pre-General reporting period. They did not file a Pre-General Report because they were not required to but they did file a Post-General Report covering the period from October 1 through November 25. In 2004, Commission records show that they made a contribution to a federal candidate in October for the General Election, so they filed both reports: the 12 Day Pre-General (covering October 1 through 13) and the 30 Day Post-General (covering October 14 through November 22). They were notified on at least three occasions in 2006 (in the January and October Record articles as well as the October 2 Prior Notice) that they may have to file both reports.

The Reviewing Officer agrees with the respondents that there were no required filings in 2006 with coverage dates of October 1 through 10. The Reviewing Officer understands why they believe the Non-Filer Notice was confusing but the Reviewing Officer believes that they contributed to this situation because they did not file the Pre-General Report when it was due and then filed an incomplete 30 Day Post-General Report on December 6. For this reason, the Non-Filer Notice referenced the Post-General Report's ten days of missing activity and the conversations between the RAD Analysts and Committee representative in January concerned that issue: the incomplete report needed to be amended to disclose the missing information.

Subsequent review of the activity itemized on the Post-General Report as well as the amendments received in January and March 2007 showed that they were required to file the Pre-General Report on time. This is the basis for the Commission's April 10 RTB finding and the \$600 civil money penalty. Furthermore, even if the Commission told them in the December 21 Notice that they must file the 12 Day Pre-General Report and they had immediately filed it, the report would still be considered not filed for purposes of the civil money penalty calculation because it is an election-sensitive report under the administrative fine regulations. 11 C.F.R. § 111.43(b), (d) and (e).

The other issue raised in the challenge (the corrective steps taken by the Treasurer) also does not fall within the list of defenses enumerated at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. The Reviewing Officer, therefore, recommends that the Commission make a final determination that the respondents violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$600.

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OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 1617 involving the FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 1617 that the FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$600; and
- (3) Send the appropriate letter.

Reviewing Analyst: Jill I. Sugarman

Attachments

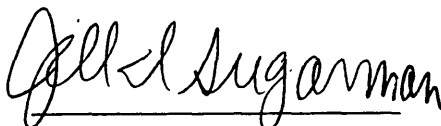
- Attachment 1 – Challenge Received from Respondents
- Attachment 2 – Declaration from RAD
- Attachment 3 – Declaration from OAR

DECLARATION OF JILL I. SUGARMAN

- 1) I am the Reviewing Analyst in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Analyst, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) The 2006 12 Day Pre-General Report is due October 26, 2006. If electronically filed, it must be received and validated by the Commission at or before 11:59 p.m., Eastern Standard/Daylight Time on October 26 to be timely filed.
- 3) It is the practice of the Commission's Information Division to send the FEC Record to committees and treasurers at their address of record, and provide FEC Record articles for placement on the Commission's web site for public access at <http://www.fec.gov/pages/record.shtml>.
- 4) It is the practice of the Commission's Report Analysis Division to document all calls to or from committees regarding a letter or mailgram they received or any questions relating to the administrative fine regulations including due dates of reports and filing requirements.
- 5) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Page 1 of the Summary Page for the 2002 30 Day Post-General Report electronically filed by the FAA Managers Association Inc. PAC and Thomas G. Dury, as Treasurer. According to the Commission's records, the report covers the period from October 1 through November 25, 2002 and was received on December 3, 2002;
 - b) Page 1 of the Summary Page and Page 59 of Schedule B for the 2004 12 Day Pre-General Report electronically filed by the FAA Managers Association Inc. PAC and Andrew Quinn, as Treasurer. According to the Commission's records, the report covers the period from October 1 through October 13, 2004 and was received on October 20, 2004. Schedule B lists a contribution made on October 6, 2004 to one House candidate committee for the General Election;
 - c) Page 1 of the Summary Page for the 2004 30 Day Post-General Report electronically filed by the FAA Managers Association Inc. PAC and Andrew Quinn, as Treasurer. According to the Commission's records, the report covers the period of October 14 through November 22, 2004 and was received on November 29, 2004;
 - d) Page 1 of the Summary Page, Page 4 of the Detailed Summary Page and Page 22 of Schedule B for the 2006 30 Day Post-General Report electronically filed by the FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer. According to the Commission's records, the report covers the period from October 11 through November 27, 2006 and was received on December 6, 2006. Line 23 lists \$11,000.00 in contributions to federal candidates/committees and other political committees for this reporting period. Schedule B lists a contribution made on October 16, 2006 to one Senate candidate committee for the General Election;

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- e) Page 1 of the Summary Page for the amended 2006 30 Day Post-General Reports electronically filed by the FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer. According to the Commission's records, the amended reports cover the period from October 1 through November 27, 2006 and were received on January 3, January 9 and March 5, 2007; and
- f) Page 1 of the Summary Page for the 2006 12 Day Pre-General Report electronically filed by the FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer. According to the Commission's records, the report covers the period from October 1 through October 18, 2006 and was received on April 17, 2007.
- 6) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 25th of October, 2007.



Jill I. Sugarman
Reviewing Analyst
Office of Administrative Review
Federal Election Commission

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Guide to 2006 Reporting

Note: All committees must also file a 2005 Year-End Report, due January 31, 2006.

Type of Filer	Required Reports				
	Quarterly	Monthly	Pre-Primary ¹	Pre-General	Post- General
House and Senate Campaigns	X		X	X	X
			Required Only if Candidate Runs in Election		
Presidential Campaigns ²	X OR	X	Not Applicable		
PACs and Party Committees Filing Monthly		X		X	X
				Filed in Lieu of November and December Monthly Reports	
PACs and Party Committees Filing Quarterly ³	X		X	X	X
			Required Only if Committee Makes Contributions or Expenditures in Connection with Election during Reporting Period ⁴		Required Regardless of Activity

¹ This category includes pre-convention and pre-runoff reports.

² Presidential committees wishing to change their filing frequency during 2006 should notify the Commission in writing. Electronic filers must file this request electronically.

³ PACs and party committees that filed on a semiannual basis in 2005 file on a quarterly basis in 2006. To avoid the need to file pre-primary and pre-runoff reports, these committees may change to monthly filing if they first notify the Commission in writing. Committees may change filing frequency only once a year. 11CFR 104.5(c). National party committees and state and local party committees with reportable receipts or disbursements for federal election activity must file on a monthly schedule. 11CFR 300.36(c)(1).

⁴ A reporting period begins with the close of books for the last report filed and ends with the closing date for the applicable report.

that receive contributions or make expenditures in excess of \$50,000 in a calendar year—or expect to do so—must file all reports and statements with the FEC electronically. Electronic filers who instead file on paper or submit an electronic report that does not pass the validation test will be considered nonfilers and may be subject to enforcement actions (including administrative fines).

Committees that file with the Secretary of the Senate² are not subject to the mandatory electronic filing rules, but are encouraged to file an unofficial electronic copy of their reports with the FEC in order to speed disclosure. 11 CFR 104.18.

The Commission's electronic filing software, FECFile 5, can be downloaded from the FEC's web site at <http://www.fec.gov/electfil/electron.shtml>. Filers may also use commercial or privately-developed software as long as the software meets the Commission's format specifications, which are available on the Commission's web site. Most paper forms are available at the FEC's web site (<http://www.fec.gov/info/forms.shtml>) and from FEC Faxline, the agency's automated fax system (202/501-3413). The 2006 Reporting Schedule is also available on the FEC's web site (http://www.fec.gov/info/report_dates.shtml), and from Faxline. For more information on reporting, call the FEC at 800/424-9530 or 202/694-1100.

Year-End Reports Covering 2005 Activity

All committees must file a 2005 year-end report due January 31, 2006. The coverage and reporting dates are found on page 4.

Reports Covering 2006 Activity

To find out which reports your committee must file in 2006, check the Guide to 2006 Reporting above. Then check the tables on page 4 and 6-9 for reporting dates. Please note that committees active in special elections in 2006 may have to file additional special election reports, as explained on page 10.

(continued on page 9)

² See "Where to File" on page 10.

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Reports

(continued from page 9)

PACs and Party Committees

State, District and Local Party Committees. State, district and local party committees that engage in federal election activity (FEA) must file on a monthly schedule. 11 CFR 300.36(c)(1). Committees that do not engage in FEA may file on a quarterly basis in 2006. (See the April 2003 *Record*, page 5, for more information on monthly filing for state, district and local party committees.)

National Party Committees. National committees of political parties must file on a monthly schedule. 2 U.S.C. §434(a)(4)(B).

Political Action Committees. PACs (separate segregated funds and nonconnected committees) that filed on a semiannual basis during 2005 must file on a quarterly basis in 2006. Monthly filers continue on the monthly schedule. PACs may change their filing schedule, but must first notify the Commission in writing. Electronic filers must file this request electronically. A committee may change its filing frequency only once a year. 11 CFR 104.5(c).

Pre- and Post-Election Reports. Please note that in 2006, party committees and PACs that file monthly reports file a pre-general election report and a post-general election report in lieu of the reports otherwise due in November and December. Party committees and PACs that file quarterly reports also file:

- A pre-primary election report and a pre-general election report before any election in which the committee makes a contribution to or an expenditure on behalf of a candidate in that election; and
- A post-general election report.

Where to File

Committee treasurers must file FEC reports with the appropriate federal office. State filing requirements also apply to reports filed by

the principal campaign committees of candidates seeking office in Guam and Puerto Rico and to reports filed by PACs and party committees who support these candidates. 2 U.S.C. §439(a)(2)(B).

House Candidate Committees. Principal campaign committees of House candidates file with the FEC. 11 CFR 105.1.

Senate Candidate Committees. Principal campaign committees of Senate candidates file with the Secretary of the Senate. 11 CFR 105.2.

Presidential Committees. Principal campaign committees of Presidential candidates file with the FEC. 11 CFR 105.3.

Candidate Committees with More Than One Authorized Committee. If a campaign includes more than one authorized committee, the principal campaign committee files, with its own report, the reports prepared by the other authorized committees as well as a consolidated report (FEC Form 3Z). 11 CFR 104.3(f).

PACs and Party Committees. PACs and party committees file with the FEC. However, committees that support only Senate candidates file with the Secretary of the Senate, as do the national Democratic and Republican Senatorial committees. 11 CFR 105.2 and 11 CFR 105.4.

Waiver of State Filing

All 50 states are now qualified under the Commission's State Filing Waiver program and are relieved of the requirement to make paper copies of FEC reports available to the public. As a result, political committees no longer have to file copies of their federal reports at the state level.³ Committees in territories not certified for the waiver must continue to file copies of their reports

³The Commission has certified that the 50 states, American Samoa and Virgin Islands qualify for filing waivers. Committees that file their reports at the FEC need not file copies in these states. Guam and Puerto Rico are not currently in the State Filing Waiver Program.

with the appropriate state election office. The addresses for the federal offices (FEC and Secretary of the Senate) appear in the instructions for the Summary Page of FEC Forms 3 and 3X. A list of state filing offices is available from the Commission.

Late Filing

The Federal Election Campaign Act does not permit the Commission to grant extensions of filing deadlines under any circumstances. Filing late reports can result in enforcement action by the Commission. The agency pursues compliance actions against late-filers and nonfilers under the Administrative Fine program and on a case-by-case basis. For more information on the Administrative Fine program, visit the FEC web site at <http://www.fec.gov/af/af.shtml>.

Independent Expenditures

Political committees and other persons who make independent expenditures at any time during the calendar year—up to and including the 20th day before an election—must disclose this activity within 48 hours each time that the expenditures aggregate \$10,000 or more. This reporting requirement is in addition to the requirement to file 24-hour notices of independent expenditures each time that disbursements for independent expenditures aggregate at or above \$1,000 during the last 20 days—up to 24 hours—before an election. 2 U.S.C. §§434(b),(d) and (g). Political committees must report all independent expenditures, whether they trigger the 48- or 24-hour reporting thresholds or not, on their regularly-scheduled disclosure reports. Other persons report these expenditures once they exceed \$250. 11 CFR 104.4(b)(1) and 109.10(b).

All individuals, persons and committees, including Senate committees, must file their 24- and 48-hour notices of independent expenditures with the Commission. 11 CFR 104.4, 109.10, 105.1 and 105.2.

Record

October 2006

Federal Election Commission

Volume 32, Number 10

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Reports

October Reporting Reminder

Committees should take note of the following due dates for October reports:

- Third quarter reports for quarterly filers are due on October 15 (close of books, September 30);
- October monthly reports for monthly filers are due on October 20 (close of books, September 30); and
- Pre-general reports are due on October 26 (close of books, October 18). Candidate committees must file this report if their candidate is running in the general election. Political action committees (PACs) and party committees that file quarterly must file this report if they make contributions or expenditures in connection with a federal election during the October 1-18 reporting period. PACs and party committees that file on a monthly schedule **must** file a pre-general report in lieu of the regular November 20 monthly report.

Note that the October 15 reporting deadline falls on a weekend. Filing deadlines are not extended when they fall on weekends. Thus, reports must be timely filed by the filing deadline (see "Other Means of Filing" below).

(continued on page 2)

Court Cases

Wisconsin Right to Life v. FEC

On September 13, 2006, a three-judge panel of the U.S. District Court for the District of Columbia denied Wisconsin Right to Life, Inc.'s (WRTL) motion for a temporary restraining order and preliminary injunction that would have prevented the Commission from enforcing the corporate financing restrictions applicable to electioneering communications (EC) with regard to certain WRTL broadcast ads to be run before the 2006 primary and general elections.

Background

Under the Federal Election Campaign Act (the Act) and Commission regulations, an EC is defined, with some exceptions, as any broadcast, cable or satellite communication that refers to a clearly identified federal candidate and is publicly distributed within 60 days before the general election or 30 days before a primary election or a nominating convention for the office sought by the candidate. 2 U.S.C. §434(f)(3) and 11 CFR 100.29. Corporations may not make ECs using their general treasury

(continued on page 4)

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

FAA Managers Association, Inc. PAC

ADDRESS (number and street) 551 QUAIL RUN
 Check if different than previously reported. (ACC) GREENWOOD IN 46142 1198

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00066070 3. IS THIS REPORT X NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)
 (a) Quarterly Reports:
 April 15 Quarterly Report(Q1) Feb 20 (M2) May 20 (M5) Aug 20 (M6) Nov 20 (M11) (Non-Election Year Only)
 July 15 Quarterly Report(Q2) Mar 20 (M3) Jun 20 (M6) Sep 20 (M9) Dec 20 (M12) (Non-Election Year Only)
 October 15 Quarterly Report(Q3) Apr 20 (M4) Jul 20 (M7) Oct 20 (M10) Jan 31 (M13)
 January 31 Quarterly Report(YE)
 July 31 Mid-Year Report(Non-election Year Only) (MY)
 Termination Report (TER)
 (b) Monthly Report Due On:
 (c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R)
 Convention (12C) Special (12S)
 Election on _____ in the State of _____
 (d) 30-Day Post-Election Report for the: General (30G) Runoff (30R) Special (30S)
 Election on 11 05 2002 in the State of IN

5. Covering Period 10 01 2002 through 11 25 2002

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Thomas G Dury
 Signature of Treasurer Electronically Filed by Mr. Thomas G Dury Date 12 03 2002

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

28092620200

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 58 / 58

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)
FAA Managers Association, Inc. PAC

Full Name (Last, First, Middle Initial)

A. FIRST FREEDOMS FUND

Mailing Address 1735 NEW YORK AVENUE NW SUITE 500

City WASHINGTON State DC Zip Code 20006

Purpose of Disbursement
Congressman Ernest Istook

Candidate Name
FIRST FREEDOMS FUND

Office Sought: House Disbursement For: 2004
Senate Primary X General
President Other (specify):
State: District

Category/
Type

Transaction ID: SB23.8257

Date of Disbursement

10 / 06 / 2004

Amount of Each Disbursement this Period

5000.00

Full Name (Last, First, Middle Initial)

B. GRAVES FOR CONGRESS

Mailing Address 4701 NW 82nd Street

City Kansas City State MO Zip Code 64151

Purpose of Disbursement
Congressman Sam Graves

Candidate Name
GRAVES FOR CONGRESS

Office Sought: X House Disbursement For: 2004
Senate Primary X General
President Other (specify):
State: MO District D6

Category/
Type

Transaction ID: SB23.8258

Date of Disbursement

10 / 06 / 2004

Amount of Each Disbursement this Period

5000.00

Handwritten initials

SUBTOTAL of Disbursements This Page (optional) 10000.00

TOTAL This Period (last page this line number only) 10000.00

28092620202

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

FAA Managers Association, Inc. PAC

ADDRESS (number and street)

1918 Pennsylvania Ave

Suite 600

Check if different than previously reported. (ACC)

Washington

DC

20008

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00366070

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Quarterly Report (YE)

July 31 Mid-Year Report (Non-election Year Only) (MY)

Termination Report (TER)

(b) Monthly Report Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11) (Non-Election Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12) (Non-Election Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the State of

(d) 30-Day Post-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

11

02

2004

in the State of

5. Covering Period 10 14 2004 through 11 22 2004

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Andrew Quinn

Signature of Treasurer Electronically Filed by Mr. Andrew Quinn Date 11 29 2004

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only

FEC FORM 3X
(Rev. 02/2003)

28092620203

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

FAA Managers Association Inc. PAC

ADDRESS (number and street)

888 16th Street NW

Suite 333

Check if different than previously reported. (ACC)

Washington

DC

2006

2. **FEC IDENTIFICATION NUMBER** CITY STATE ZIP CODE

C00366070

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Quarterly Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report
Feb 20 (M2) May 20 (M5) Aug 20 (M8) Nov 20 (M11) (Non-Election Year Only)
Due On: Mar 20 (M3) Jun 20 (M6) Sep 20 (M9) Dec 20 (M12) (Non-Election Year Only)
Apr 20 (M4) Jul 20 (M7) Oct 20 (M10) Jan 31 (YE)

(c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R)
Convention (12C) Special (12G)
Election on _____ in the State of _____

(d) 30-Day Post-Election Report for the: General (30G) Runoff (30R) Special (30S)
Election on 11 07 2006 in the State of DC

5. Covering Period 10 11 2006 through 11 27 2006

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Louis H Dupart

Signature of Treasurer Electronically Filed by Mr. Louis H Dupart Date 12 06 2006

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office Use Only

FEC FORM 3X
(Rev. 02/2003)

28092620204

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Shared Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share.....	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures.....	0.00	0.00
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii) and (b))..... ▶	0.00	0.00
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	11000.00	81000.00
24. Independent Expenditure (use Schedule E).....	0.00	0.00
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees.....	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))..... ▶	0.00	0.00
29. Other Disbursements.....	0.00	0.00
30. Federal Election Activity (2 U.S.C. 431(20))		
(a) Shared Federal Election Activity (from Schedule H6)		
(i) Federal Share.....	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds.....	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))....	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	11000.00	81000.00
32. Total Federal Disbursements (subtract Line 21(a)(ii) from Line 30(a)(ii) from Line 31).....	11000.00	81000.00

28092620205

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 22 / 23

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)
FAA Managers Association Inc. PAC

Full Name (Last, First, Middle Initial)

A. FRIENDS OF CONRAD BURNS - 2006

Mailing Address PO BOX 1596

City HELENA State MT Zip Code 59624

Purpose of Disbursement

Candidate Name

Office Sought: House Disbursement For: 2006
 Senate Primary General
 President Other (specify) ▼
 State: MT District

Category/
Type

Transaction ID: SB23.5096

Date of Disbursement

10 : 16 : 2006

Amount of Each Disbursement this Period

2500.00

Full Name (Last, First, Middle Initial)

B. FRIENDS OF THE BIG SKY

Mailing Address PO Box 1487

City Helena State MT Zip Code 59624

Purpose of Disbursement

Candidate Name

Office Sought: House Disbursement For: 2006
 Senate Primary General
 President Other (specify) ▼
 State: MT District Leadership PAC

Category/
Type

Transaction ID: SB23.5096

Date of Disbursement

10 : 16 : 2006

Amount of Each Disbursement this Period

2500.00

Full Name (Last, First, Middle Initial)

C. OHIO'S 17 STAR PAC

Mailing Address P.O. Box 340917

City Columbus State OH Zip Code 43234

Purpose of Disbursement

Candidate Name

Office Sought: House Disbursement For: 2006
 Senate Primary General
 President Other (specify) ▼
 State: OH District Leadership PAC

Category/
Type

Transaction ID: SB23.5094

Date of Disbursement

10 : 12 : 2006

Amount of Each Disbursement this Period

5000.00

SUBTOTAL of Disbursements This Page (optional) ▶

10000.00

TOTAL This Period (last page this line number only) ▶

28092620206

ja

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

FAA Managers Association Inc. PAC

ADDRESS (number and street)

858 16th Street NW

Suite 333

Check if different than previously reported. (ACC)

Washington

DC

20006

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00366070

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Quarterly Report (YE)

July 31 Mid-Year Report (Non-election Year Only) (MY)

Termination Report (TER)

(b) Monthly Report Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11) (Non-Election Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12) (Non-Election Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the State of

(d) 30-Day Post-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

11

07

2006

in the State of

DC

5. Covering Period 10 01 2006 through 11 27 2006

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Louis H Dupart

Signature of Treasurer Electronically Filed by Mr. Louis H Dupart Date 01 03 2007

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only

FEC FORM 3X
(Rev. 02/2003)

28092620207

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

FAA Managers Association Inc. PAC

ADDRESS (number and street)

888 16th Street NW

Suite 530

Check if different than previously reported. (ACC)

Washington

DC

2008

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00366070

3. IS THIS REPORT NEW (N) OR X AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Quarterly Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report Due On:

Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

Primary (12P)	General (12G)	Runoff (12R)
Convention (12C)	Special (12S)	

Election on

in the State of

(d) 30-Day Post-Election Report for the:

X	General (30G)	Runoff (30R)	Special (30S)
---	---------------	--------------	---------------

Election on

in the State of

5. Covering Period 10 01 2008 through 11 27 2008

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Louis H Dupart

Signature of Treasurer Electronically Filed by Mr. Louis H Dupart Date 01 09 2007

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only

FEC FORM 3X
(Rev. 02/2003)

28092620208

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) USE FEC MAILING LABEL OR TYPE OR PRINT Example: If typing, type over the lines

FAA Managers Association Inc. PAC

ADDRESS (number and street)

858 16th Street NW

Suite 530

Check if different than previously reported. (ACC)

Washington

DC

20008

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00366070

3. IS THIS REPORT NEW (N) OR x AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report(Q1)
July 15 Quarterly Report(Q2)
October 15 Quarterly Report(Q3)
January 31 Quarterly Report(YE)
July 31 Mid-Year Report(Non-election Year Only) (MY)
Termination Report (TER)

(b) Monthly Report Due On: Feb 20 (M2), May 20 (M5), Aug 20 (M8), Nov 20 (M11) (Non-Election Year Only), Mar 20 (M3), Jun 20 (M6), Sep 20 (M9), Dec 20 (M12) (Non-Election Year Only), Apr 20 (M4), Jul 20 (M7), Oct 20 (M10), Jan 31 (YE)

(c) 12-Day PRE-Election Report for the: Primary (12P), General (12G), Runoff (12R), Convention (12C), Special (12G)

(d) 30-Day Post-Election Report for the: Election on 11 07 2006 in the State of DC, General (30G), Runoff (30R), Special (30S)

5. Covering Period 10 01 2006 through 11 27 2006

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Louis H Dupart

Signature of Treasurer Electronically Filed by Mr. Louis H Dupart Date 03 05 2007

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only

FEC FORM 3X (Rev. 02/2003)

28092620209

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

FAA Managers Association Inc. PAC

ADDRESS (number and street)

658 16th Street NW

Suite 530

Check if different than previously reported. (ACC)

Washington

DC

20008

2. FEC IDENTIFICATION NUMBER CITY STATE ZIP CODE

C00366070

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Quarterly Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report Due On:

Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

Primary (12P)	<input checked="" type="checkbox"/>	General (12G)	Runoff (12R)
Convention (12C)		Special (12S)	

Election on 11 07 2006 in the State of

(d) 30-Day Post-Election Report for the:

General (30G)		Runoff (30R)	Special (30S)
---------------	--	--------------	---------------

Election on in the State of

5. Covering Period 10 01 2006 through 10 18 2006

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Louis H Dupart

Signature of Treasurer Electronically Filed by Mr. Louis H Dupart Date 04 17 2007

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office Use Only

FEC FORM 3X
(Rev. 02/2003)

28092620210



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

October 26, 2007

Louis H. Dupart, as Treasurer
FAA Managers Association Inc. PAC
888 16th Street, NW, Suite 333
Washington, DC 20006

C00366070
AF# 1617

Dear Mr. Dupart:

On April 10, 2007, the Federal Election Commission ("Commission") found reason to believe ("RTB") that the FAA Managers Association Inc. PAC and you, as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2006 12 Day Pre-General Report. The Commission also made a preliminary determination that the civil money penalty was \$600 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

Jill I. Sugarman

Jill I. Sugarman
Reviewing Analyst
Office of Administrative Review

Attachment

28092620211



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2007 NOV 13 P 3: 20

SENSITIVE

November 13, 2007

MEMORANDUM

To: The Commission

Through: Patrina M. Clark *PMK*
Staff Director

From: John D. Gibson *JDG*
Chief Compliance Officer

Shawn Woodhead Wertz *SW*
Reviewing Officer
Office of Administrative Review

By: Jill I. Sugarman *JIS*
Reviewing Analyst

Subject: Final Determination Recommendation in AF# 1617 – FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer (C00366070)

On April 10, 2007, the Commission found reason to believe that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2006 12 Day Pre-General Report, an election sensitive report, and made a preliminary determination that the civil money penalty was \$600 based on the schedule of penalties at 11 C.F.R. § 111.43.

On May 21, 2007, the Commission received the respondents' written response ("challenge"). After reviewing the challenge, the Reviewing Officer's recommendation dated October 25, 2007 was forwarded to the Commission, a copy was sent to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission assess a civil money penalty of \$600 because they submitted no evidence that the RTB finding was based on factual errors, that the civil money penalty was improperly calculated at RTB, or that they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances.

Instead of filing a written response with the Commission Secretary within 10 days of transmittal of the recommendation in accordance with 11 C.F.R. § 111.36(f), the respondents paid the civil money penalty.

28092620212

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 1617 involving the FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 1617 that the FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$600; and
- (3) Send the appropriate letter.

28092620213



FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Tuesday, November 13, 2007 4:00

BALLOT DEADLINE: Friday, November 16, 2007 4:00

COMMISSIONER: LENHARD, MASON, von SPAKOVSKY, WALTHER, WEINTRAUB

SUBJECT: **Final Determination Recommendation in
AF 1617 - FAA Managers Association Inc.
PAC and Louis H. Dupart, as Treasurer
(C00366070) Memorandum from the Chief
Compliance Officer and the Reviewing
Officer dated November 13, 2007**

- I approve the recommendation(s)
- I object to the recommendation(s)
- I am recused from voting
- No vote by ballot

COMMENTS: _____

DATE: _____

SIGNATURE: _____

A definite vote is required. All ballots must be signed and dated. Please return ONLY THE BALLOT to the Commission Secretary. Please return ballot no later than date and time shown above.

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

28092620214

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation:) AF 1617
FAA Managers Association Inc. PAC)
and Louis H. Dupart, as Treasurer)
(C00366070)

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on November 16, 2007, the Commission decided by a vote of 4-0 to take the following actions in AF 1617:

1. Adopt the Reviewing Officer recommendation for AF 1617 involving the FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer, in making the final determination, as recommended in the Reviewing Officer's Memorandum dated November 13, 2007.
2. Make a final determination in AF 1617 that FAA Managers Association Inc. PAC and Louis H. Dupart, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$600.
3. Send the appropriate letter.

Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

Attest:

November 19, 2007
Date

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

28092620215



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 20, 2007

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis H. Dupart, as Treasurer
FAA Managers Association Inc. PAC
888 16th Street, NW, Suite 530
Washington, DC 20006

C00366070
AF# 1617

Dear Mr. Dupart:

On April 10, 2007, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that the FAA Managers Association Inc. PAC and you, as Treasurer, violated 2 U.S.C. § 434(a) for failing to file the 2006 12 Day Pre-General Report. By letter dated April 12, 2007, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$600 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On May 21, 2007, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and the written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that the FAA Managers Association Inc. PAC and you, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty in the amount of \$600 in accordance with 11 C.F.R. § 111.43. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on October 26, 2007.

The \$600 payment for the civil money penalty was received at the Commission's lockbox on November 8, 2007.

On November 16, 2007, the Commission adopted the Reviewing Officer's recommendation and made a final determination that the FAA Managers Association Inc. PAC and you, as Treasurer, violated 2 U.S.C. § 434(a) and assessed a civil money penalty of \$600. It is based on the same factors used to calculate the civil money penalty at RTB. A copy of the final determination memorandum is attached.

28092620216

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 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding this matter, please contact Jill Sugarman on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,



Robert D. Lenhard
Chairman

Attachment

28092620217

FOR: FAA Managers Association Inc. PAC

FEC ID#: C00366070

AF#: 1617

PAYMENT DUE DATE: 5/20/2007

PAYMENT AMOUNT DUE: \$600

QUALITY IS OUR PRIORITY FOR LOCKBOX 9058
SEQ# 001 \$ 000060000 BA# 1 11-07-07 20 9



28092620218

usbancorp.
The Sun Trust Company

THE NORMANDY GROUP LLC 02-06
[REDACTED]

0673
65-270550

DATE Nov. 2, 2007

PAY TO THE ORDER OF Federal Election Commission \$ 600.⁰⁰

Six hundred dollars DOLLARS

SUNTRUST ACH RT 061000104

FOR FAA Managers Association Inc PAC FEC-C00366070
[REDACTED]

[Signature]



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1617

DATE SCANNED 2/21/88

SCANNER NO. 2

SCAN OPERATOR EEJ

28092620219