



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2671

DATE SCANNED 7-12-13

SCANNER NO. 2

SCAN OPERATOR JMP

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION  
COMMISSION  
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March 29, 2013

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: *AP* Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *JW* Jodi Winship/Sari Pickerall *JP*  
Compliance Branch

SUBJECT: Reason To Believe Recommendation - 2012 30 Day Post-General Report  
(Unauthorized Filers) For The Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2012 30 Day Post-General Report in accordance with 2 U.S.C. § 434(a). The list is comprised of unauthorized committees that failed to file or timely file the 2012 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, within thirty (30) days of the due date (considered a late filed report), or 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 indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2012 through November 26, 2012 (57 days), was reviewed for activity which would have required the filing of a 12 Day Report. If our

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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 25% (17 days (12G Filing Period)/57 days (30G Filing Period)). The committees identified through this process as failing to file or failing to timely file the 12 Day Pre-General Report were included in the Reason to Believe Recommendation circulated to the Commission on March 28, 2013. 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 also be assessed a fine for the 30 Day Reports based on the estimated levels of activity described above and are included on the attached list.

#### **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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Federal Election Commission  
Reason to Believe Circulation Report  
2012 POST-GENERAL Not Election Sensitive 12/06/2012 UNAUTH

| AF#  | Committee ID | Committee Name                                 | Candidate Name | Treasurer        | Threshold | PV | Receipt Date | Days Late | LOA      | RTB Penalty |
|------|--------------|--|----------------|------------------|-----------|----|--------------|-----------|----------|-------------|
| 2671 | C00420125    | CHIANG PATEL AND YERBY INC PAC                 |                | DAVID W. HAYS    | \$146,325 | 1  | 1/31/2013    | Not Filed | \$2,000  | \$312       |
| 2672 | C00422352    | CLEAN ENERGY PAC OF IBERDROLA RENEWABLES, INC. |                | RICHARD A GLICK  | \$119,987 | 0  | 1/14/2013    | Not Filed | \$25,473 | \$990       |
| 2673 | C00451518    | CROWE PAC                                      |                | ROBERT W. LAZARD | \$267,737 | 0  | 12/12/2012   | 6         | \$24,149 | \$140       |
| 2674 | C00468009    | EDWARDS WILDMAN PAC INC                        |                | KEITH KOTLER     | \$418,082 | 0  | 2/22/2013    | Not Filed | \$22,291 | \$550       |

|      |           |   |  |                   |           |   |            |           |          |       |
|------|-----------|---|--|-------------------|-----------|---|------------|-----------|----------|-------|
| 2676 | C00496259 | IMMIGRATION911, LLC   |  | STANLEY P. DULL   | \$505,587 | 1 | 2/13/2013  | Not Filed | \$24,971 | \$687 |
| 2677 | C00354613 | INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE |  | MARTIN MASCULLI   | \$109,509 | 1 | 1/30/2013  | Not Filed | \$9,208  | \$412 |
| 2678 | C00417717 | KENTUCKY FORWARD PAC  |  | R. WAYNE STRATTON | \$116,770 | 0 | 2/6/2013   | Not Filed | \$17,293 | \$550 |
| 2679 | C00426320 | LIBERTARIAN PARTY OF INDIANA  |  | TODD SINGER       | \$175,056 | 3 | 1/31/2013  | Not Filed | \$10,231 | \$962 |
| 2680 | C00357905 | LOUISIANA SHERIFFS AND DEPUTIES POLITICAL ACTION COMMITTEE          |  | MIKE CAZES        | \$568,859 | 0 | 12/21/2012 | 15        | \$23,867 | \$185 |
| 2681 | C00426809 | MADISON PAC; THE  |  | BRIAN J. AHERN    | \$694,588 | 0 | 12/23/2012 | 17        | \$20,236 | \$195 |

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| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|-----|--------------|----------------|----------------|-----------|-----------|----|--------------|-----------|-----|-------------|
|-----|--------------|----------------|----------------|-----------|-----------|----|--------------|-----------|-----|-------------|

|      |           |  |  |                    |           |   |            |    |          |         |
|------|-----------|--|--|--------------------|-----------|---|------------|----|----------|---------|
| 2687 | C00446674 | WESTERN SUGAR<br>COOPERATIVE POLITICAL<br>ACTION COMMITTEE |  | J. KENT<br>WIMMER  | \$299,912 | 0 | 1/2/2013   | 27 | \$2,000  | \$160   |
| 2688 | C00424150 | WOMEN'S CAMPAIGN FORUM                                     |  | SIOBHAN<br>BENNETT | \$390,544 | 3 | 12/18/2012 | 12 | \$82,160 | \$3,080 |

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation – )  
2012 30 Day Post-General Report )  
(Unauthorized Filers) For The )  
Administrative Fine Program: )  
CHIANG PATEL AND YERBY INC PAC, ) AF# 2671  
and DAVID W HAYS as treasurer; )  
CLEAN ENERGY PAC OF IBERDROLA ) AF# 2672  
RENEWABLES, INC., and GLICK, )  
RICHARD A as treasurer; )  
CROWE PAC, and LAZARD, ROBERT ) AF# 2673  
W. MR. as treasurer; )  
EDWARDS WILDMAN PAC INC, and ) AF# 2674  
KOTLER, KEITH as treasurer; )

IMMIGRATION911, LLC, and STANLEY ) AF# 2676  
P DULL as treasurer; )  
INT LONGSHOREMENS ASSOC (ILA) ) AF# 2677  
LOCAL 1291 POLITICAL ACTION )  
COMMITTEE, and MARTIN MASCUILLI )  
as treasurer; )  
KENTUCKY FORWARD PAC, and ) AF# 2678  
WAYNE STRATTON as treasurer; )  
LIBERTARIAN PARTY OF INDIANA, ) AF# 2679  
and TODD SINGER as treasurer; )  
LOUISIANA SHERIFFS AND DEPUTIES ) AF# 2680  
POLITICAL ACTION COMMITTEE, and )  
CAZES, MIKE as treasurer; )  
MADISON PAC; THE, and AHERN, ) AF# 2681  
BRIAN J. MR. as treasurer; )

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WESTERN SUGAR COOPERATIVE ) AF# 2687  
POLITICAL ACTION COMMITTEE, and )  
KENT, J. MR. WIMMER as treasurer; )  
WOMEN'S CAMPAIGN FORUM, and ) AF# 2688  
SIOBHAN BENNETT as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 01, 2013 the Commission took the following actions on the Reason To Believe Recommendation – 2012 30 Day Post-General Report (Unauthorized Filers) For The Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 29, 2013, on the following committees:

AF#2671 Decided by a vote of 5-0 to: (1) find reason to believe that CHIANG PATEL AND YERBY INC PAC, and DAVID W HAYS 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2672 Decided by a vote of 5-0 to: (1) find reason to believe that CLEAN ENERGY PAC OF IBERDROLA RENEWABLES, INC., and GLICK, RICHARD A as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil

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money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2673 Decided by a vote of 5-0 to: (1) find reason to believe that CROWE PAC, and LAZARD, ROBERT W. 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2674 Decided by a vote of 5-0 to: (1) find reason to believe that EDWARDS WILDMAN PAC INC, and KOTLER, KEITH 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2676 Decided by a vote of 5-0 to: (1) find reason to believe that IMMIGRATION911, LLC, and STANLEY P DULL 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2677 Decided by a vote of 5-0 to: (1) find reason to believe that INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE, and MARTIN MASCULLI 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2678 Decided by a vote of 5-0 to: (1) find reason to believe that KENTUCKY FORWARD PAC, and WAYNE STRATTON 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2679 Decided by a vote of 5-0 to: (1) find reason to believe that LIBERTARIAN PARTY OF INDIANA, and TODD SINGER as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would

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be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2680 Decided by a vote of 5-0 to: (1) find reason to believe that LOUISIANA SHERIFFS AND DEPUTIES POLITICAL ACTION COMMITTEE, and CAZES, MIKE 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2681 Decided by a vote of 5-0 to: (1) find reason to believe that MADISON PAC; THE, and AHERN, BRIAN J. 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2687 Decided by a vote of 5-0 to: (1) find reason to believe that WESTERN SUGAR COOPERATIVE POLITICAL ACTION COMMITTEE, and KENT, J. MR. WIMMER 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2688 Decided by a vote of 5-0 to: (1) find reason to believe that WOMEN'S CAMPAIGN FORUM, and SIOBHAN BENNETT 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 Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

April 2, 2013  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 2, 2013

David W. Hays, in official capacity as Treasurer  
Chiang Patel and Yerby Inc PAC  
1820 Regal Row, Suite 200  
Dallas, TX 75235

C00420125  
AF#: 2671

Dear Mr. Hays:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period through November 26, 2012, shall be filed no later than December 6, 2012. 2 U.S.C. 434(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty.

The Act permits 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 April 1, 2013, the FEC found that there is reason to believe ("RTB") that Chiang Patel and Yerby Inc PAC and you, in your official capacity as treasurer, violated 2 U.S.C. 434(a) by failing to file timely this report on or before December 6, 2012. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$312. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$312 is due within forty (40) days of the finding, or by May 11, 2013, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$2,000

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purpose of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 1

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

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If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or May 11, 2013. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and 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. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "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 U.S. district court under 2 U.S.C. § 437g. 11 CFR § 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.

## **2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Chiang Patel and Yerby Inc PAC and you, in your official capacity 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

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action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

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 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall 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.

On behalf of the Commission,



Ellen L. Weintraub  
Chair

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$312 for the 2012 Post-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 May 11, 2013. 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: Chiang Patel and Yerby Inc PAC

FEC ID#: C00420125

AF#: 2671

PAYMENT DUE DATE: May 11, 2013

PAYMENT AMOUNT DUE: \$312

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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FEDERAL ELECTION  
COMMISSION  
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June 6, 2013

**SENSITIVE**

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: *KD* Kristin DeCarmine/Sari Pickeral *DP*  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2012 30 Day Post-General Report (Unauthorized Committees)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2012 30 Day Post-General Report (Unauthorized Committees). The first list represents the committees that have paid the civil money penalty and the second list represents those committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

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

For your information, two (2) committees detailed below designated a new Treasurer after the RTB finding:

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- Libertarian Party of Indiana (AF 2679) filed an Amended Statement of Organization after the RTB finding designating Michael C. Schultheiss, as Treasurer (see first list).

**RAD Recommendation**

- (1) Make final determination that the political committees and their treasurers on the attached reports violated 2 U.S.C. § 434(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

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Federal Election Commission  
FD Circulation Report Fine Paid  
2012 POST-GENERAL Not Election Sensitive 12/06/2012 UNAUTH

| AF#  | Committee Name  | Candidate Name | Committee ID | Treasurer              | Receipt Date | Days Late | LOA      | PV | RTB Date   | RTB Penalty | Final Money Penalty | Date Paid  | Amount Paid |
|------|---|----------------|--------------|------------------------|--------------|-----------|----------|----|------------|-------------|---------------------|------------|-------------|
| 2671 | CHIANG PATEL AND YERBY INC PAC                                      |                | C00420125    | DAVID W. HAYS          | 01/31/2013   | Not Filed | \$2,000  | 1  | 04/01/2013 | \$312       | \$312               | 04/08/2013 | \$312       |
| 2672 | CLEAN ENERGY PAC OF IBERDROLA RENEWABLES, INC.                      |                | C00422352    | RICHARD A. GLICK       | 01/14/2013   | Not Filed | \$25,473 | 0  | 04/01/2013 | \$990       | \$990               | 05/07/2013 | \$990       |
| 2673 | CROWE PAC   |                | C00451518    | ROBERT W. LAZARD       | 12/12/2012   | 0         | \$24,148 | 0  | 04/01/2013 | \$140       | \$140               | 04/12/2013 | \$140       |
| 2674 | EDWARDS WILDMAN PAC INC   |                | C00468009    | JOHN HOLTHAUS          | 02/22/2013   | Not Filed | \$22,291 | 0  | 04/01/2013 | \$550       | \$550               | 05/14/2013 | \$550       |
| 2676 | IMMIGRATION11, LLC  |                | C00495259    | STANLEY P. DULL        | 02/13/2013   | Not Filed | \$24,971 | 1  | 04/01/2013 | \$687       | \$687               | 04/30/2013 | \$687       |
| 2677 | INT LONGSHOREMENS ASSOC (ILA) LOCAL 1281 POLITICAL ACTION COMMITTEE |                | C00354613    | MARTIN MASCUILLI       | 01/30/2013   | Not Filed | \$9,208  | 1  | 04/01/2013 | \$412       | \$412               | 05/10/2013 | \$412       |
| 2678 | LIBERTARIAN PARTY OF INDIANA  |                | C00426326    | MICHAEL C. SCHULTHEISS | 01/31/2013   | Not Filed | \$10,231 | 3  | 04/01/2013 | \$962       | \$962               | 04/17/2013 | \$962       |
| 2680 | LOUISIANA SHERIFFS AND DEPUTIES POLITICAL ACTION COMMITTEE          |                | C00357900    | MIKE CAZES             | 12/21/2012   | 05        | \$23,887 | 0  | 04/01/2013 | \$185       | \$185               | 05/03/2013 | \$185       |
| 2681 | MADISON PAC, THE  |                | C00426809    | BRIAN J. AHERN         | 12/23/2012   | 17        | \$20,236 | 0  | 04/01/2013 | \$195       | \$195               | 04/23/2013 | \$195       |
| 2687 | WESTERN SUGAR COOPERATIVE POLITICAL ACTION COMMITTEE                |                | C00446674    | J. KENT WIMMER         | 01/02/2013   | 27        | \$2,000  | 0  | 04/01/2013 | \$160       | \$160               | 04/12/2013 | \$160       |
| 2688 | WOMEN'S CAMPAIGN FORUM  |                | C00424150    | SIOBHAN BENNETT        | 12/18/2012   | 12        | \$82,160 | 3  | 04/01/2013 | \$3,080     | \$3,080             | 05/07/2013 | \$3,080     |

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Federal Election Commission  
FD Circulation Report Fine Not Paid  
2012 POST-GENERAL Not Election Sensitive 12/06/2012 UNAUTH

| AF#  | Committee Name       | Candidate Name | Committee ID | Treasurer      | Receipt Date | Days Late | LOA      | PV | RTB Date   | RTB Penalty | Days Since RTB | FD Penalty |
|------|----------------------|----------------|--------------|----------------|--------------|-----------|----------|----|------------|-------------|----------------|------------|
| 2678 | KENTUCKY FORWARD PAC |                | C00417717    | WAYNE STRATTON | 02/06/2013   | Not Filed | \$17,293 | 0  | 04/01/2013 | \$550       | 66             | \$550      |

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program - Final )  
Determination Recommendation for the )  
2012 30 Day Post-General Report )  
(Unauthorized Committees): )  
CHIANG PATEL AND YERBY INC PAC, ) AF# 2671  
and DAVID W HAYS as treasurer; )  
CLEAN ENERGY PAC OF IBERDROLA ) AF# 2672  
RENEWABLES, INC., and GLICK, )  
RICHARD A as treasurer; )  
CROWE PAC, and LAZARD, ROBERT ) AF# 2673  
W. MR. as treasurer; )  
EDWARDS WILDMAN PAC INC, and ) AF# 2674  
HOLTHAUS, JOHN as treasurer; )  
IMMIGRATION911, LLC, and STANLEY ) AF# 2676  
P DULL as treasurer; )  
INT LONGSHOREMENS ASSOC (ILA) ) AF# 2677  
LOCAL 1291 POLITICAL ACTION )  
COMMITTEE, and MARTIN MASCULLI )  
as treasurer; )  
KENTUCKY FORWARD PAC, and ) AF# 2678  
WAYNE STRATTON as treasurer; )  
LIBERTARIAN PARTY OF INDIANA, ) AF# 2679  
and SCHULTHEISS, MICHAEL C as )  
treasurer; )  
LOUISIANA SHERIFFS AND DEPUTIES ) AF# 2680  
POLITICAL ACTION COMMITTEE, and )  
CAZES, MIKE as treasurer; )  
MADISON PAC; THE, and AHERN, ) AF# 2681  
BRIAN J. MR. as treasurer; )

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WESTERN SUGAR COOPERATIVE ) AF# 2687  
POLITICAL ACTION COMMITTEE, and )  
KENT, J. MR. WIMMER as treasurer; )  
WOMEN'S CAMPAIGN FORUM, and ) AF# 2688  
SIOBHAN BENNETT as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 07, 2013 the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation for the 2012 30 Day Post-General Report (Unauthorized Committees) as recommended in the Reports Analysis Division's Memorandum dated June 06, 2013, on the following committees:

AF#2671 Decided by a vote of 5-0 to: (1) make a final determination that CHIANG PATEL AND YERBY INC PAC, and DAVID W HAYS as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2672 Decided by a vote of 5-0 to: (1) make a final determination that CLEAN ENERGY PAC OF BERDROLA RENEWABLES, INC., and GLICK, RICHARD A as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2673 Decided by a vote of 5-0 to: (1) make a final determination that CROWE PAC, and LAZARD, ROBERT W. MR. as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2674 Decided by a vote of 5-0 to: (1) make a final determination that EDWARDS WILDMAN PAC INC, and HOLTHAUS, JOHN as treasurer , violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the

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appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2676 Decided by a vote of 5-0 to: (1) make a final determination that IMMIGRATION911, LLC, and STANLEY P DULL as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2677 Decided by a vote of 5-0 to: (1) make a final determination that INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE, and MARTIN MASCULLI as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2678 Decided by a vote of 5-0 to: (1) make a final determination that KENTUCKY FORWARD PAC, and WAYNE STRATTON as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2679 Decided by a vote of 5-0 to: (1) make a final determination that LIBERTARIAN PARTY OF INDIANA, and SCHULTHEISS, MICHAEL C as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2680 Decided by a vote of 5-0 to: (1) make a final determination that LOUISIANA SHERIFFS AND DEPUTIES POLITICAL ACTION COMMITTEE, and CAZES, MIKE as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2681 Decided by a vote of 5-0 to: (1) make a final determination that MADISON PAC; THE, and AHERN, BRIAN J. MR. as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#2687 Decided by a vote of 5-0 to: (1) make a final determination that WESTERN SUGAR COOPERATIVE POLITICAL ACTION COMMITTEE, and KENT, J. MR. WIMMER as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#2688 Decided by a vote of 5-0 to: (1) make a final determination that WOMEN'S CAMPAIGN FORUM, and SIOBHAN BENNETT as treasurer, violated 2 U.S.C. 434(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

June 7, 2013  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 10, 2013

David W. Hays, in official capacity as Treasurer  
Chiang, Patel and Yerby, Inc PAC  
1820 Regal Row, Suite 200  
Dallas, TX 75235

C00420125  
AF#: 2671

Dear Mr. Hays:

On April 1, 2013, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Chiang, Patel and Yerby, Inc PAC and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a) for filing late or failing to file the 2012 Post-General Report. By letter dated April 2, 2013, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$312 in accordance with the schedule of penalties at 11 CFR § 111.43.

On April 9, 2013, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on June 7, 2013 that Chiang, Patel and Yerby, Inc PAC and you, in your official capacity as treasurer, violated 2 U.S.C. § 434(a), assessed a civil money penalty in the amount of \$312 in accordance with 11 CFR § 111.43, and voted to close the file.

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 CFR § 111.42(b). Although the file must be placed on the public record within thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding this matter, please contact Sari Pickerall on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in black ink that reads "Ellen L. Weintraub". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ellen L. Weintraub  
Chair

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FOR: Chiang Patel and Yerby Inc PAC

FEC ID#: C00420125

AF#: 2671

PAYMENT DUE DATE: May 11, 2013

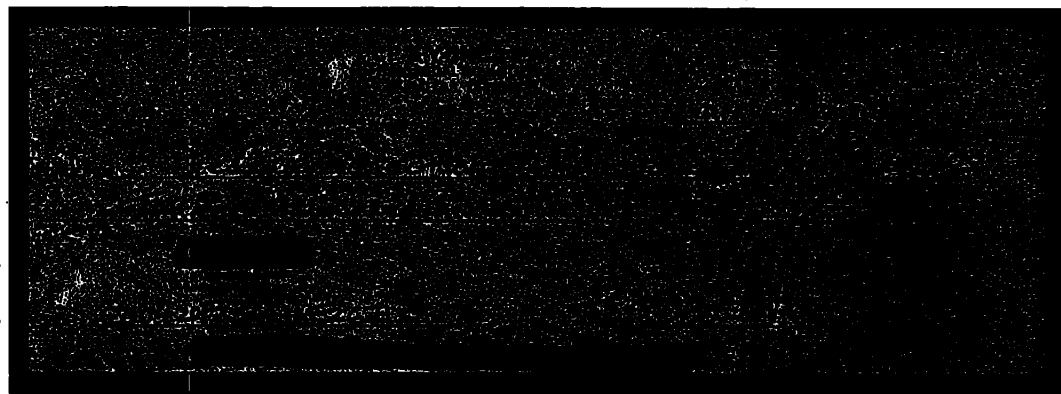
PAYMENT AMOUNT DUE: \$312

FEDERAL ELECTION COMMISSION

Lockbox: GLX-979058 Ledger Date 04/08/2013

**usbank.**

St. Louis GA Lockbox  
(314) 425-1818



| Batch | Item | TID       | Batch Total | Amount   |
|-------|------|-----------|-------------|----------|
| 1     | 3    | Y-4089795 | \$2,627.00  | \$312.00 |





FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2671

DATE SCANNED 7-12-13

SCANNER NO. 2

SCAN OPERATOR JMB

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