



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #2920

DATE SCANNED 8/3/15

SCANNER NO. 2

SCAN OPERATOR OB



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RECEIVED  
FEDERAL  
ELECTION  
COMMISSION  
SECRETARIAT

2015 MAR 27 PM 3:31

March 27, 2015

**SENSITIVE**

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *EPW/for*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

KDR *DP*  
BY: Kristin D. Roser/Sari Pickerall  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2014 12 Day Pre-General Report  
(Unauthorized Quarterly Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2014 12 Day Pre-General Report in accordance with 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)). The list is comprised of unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2014 through October 15, 2014, and failed to file or timely file the 2014 12 Day Pre-General Report.

The committees appearing on the 2014 12 Day Pre-General Report list failed to file the report prior to four (4) days before the General Election (considered a non-filed report). In accordance with 11 CFR § 111.43, these committees should be assessed the civil money penalties indicated in the attachments.

As noted above, the 2014 12 Day Pre-General Report circulation list includes unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2014 through October 15, 2014, but failed to file or timely file the 2014 12 Day Pre-General Election report. In order to accurately identify these committees for administrative fine purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12 Day Pre-General Report (12G) 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 (30G) submitted by an unauthorized quarterly filer that covered the period from October 1, 2014 through November 24, 2014 (55 days) was reviewed for activity which would have required the filing of a 12G. If our research indicated that a 12G was required, we utilized a three-step method to arrive at the activity on which to base the 12G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 27% (15 days (12G Filing Period)/55 days (30G Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 12G.

#### **Recommendation**

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Reports violated 52 U.S.C. § 30104(a) (formerly 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.

Federal Election Commission  
 Reason to Believe Circulation Report  
 2014 PRE-GENERAL Election Sensitive 10/23/2014 UNAUTH\_Q

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2910	C00142315	BOYD GAMING POLITICAL ACTION COMMITTEE		RICK DARNOLD	\$196,512	0	12/12/2014	Not Filed	\$5,008 (est)	\$660
2911	C00420125	CHIANG PATEL AND YERBY INC PAC		DAVID W. HAYS	\$173,778	2	12/23/2014	Not Filed	\$6,000	\$990
2912	C00370759	DRINKER BIDDLE POLITICAL ACTION COMMITTEE		JONATHAN TARNOW	\$254,192	0	12/4/2014	Not Filed	\$6,682 (est)	\$660
2913	C00160630	DRUMMOND COMPANY, INC. POLITICAL ACTION COMMITTEE (DPAC)		SCOTT O. STANFIELD	\$274,707	0	12/3/2014	Not Filed	\$12,500	\$1,090
2914	C00504753	FEDERAL FOREST RESOURCE COALITION PAC (FFRC PAC)		WILLIAM G. IMBERGAMO	\$179,909	0	1/6/2015	Not Filed	\$2,000	\$550
2915	C00484667	ICE PAC		REID LEBEAU	\$351,343	0	12/21/2014	Not Filed	\$55,940	\$3,300
2916	C00137273	M&T BANK AND WILMINGTON TRUST POLITICAL ACTION COMMITTEE		JULIAN BROGGIO	\$290,124	0	12/5/2014	Not Filed	\$3,624	\$550
2917	C00375451	MOVING AMERICA FORWARD		JENNIFER G. MITCHELL	\$184,548	0	12/6/2014	Not Filed	\$20,500	\$1,090
2918	C00379180	NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS RESPONSIBLE DISTRIBUTION POLITICAL ACTION CO		LISA J. VIENNA	\$555,622	0	12/29/2014	Not Filed	\$10,136	\$1,090
2919	C00154104	NATIONAL POTATO COUNCIL POTATO POLITICAL ACTION COMMITTEE		JOHN KEELING, JR.	\$207,240	0	12/3/2014	Not Filed	\$1,000	\$550
2920	C00422519	NEW TRIER DEMOCRATIC ORGANIZATION		JOHN MICHAEL UNGASHICK	\$211,048	0	11/7/2014	Not Filed	\$6,445 (est)	\$660
2921	C00406553	PROGRESSIVE VOTERS OF AMERICA		F. PHILIP FIERMONTTE	\$874,976	0	1/30/2015	Not Filed	\$151,606	\$6,600
2923	C00542514	VIGOR PAC		TAYLOR CHRISTINE LUBY	\$134,172	0	11/25/2014	Not Filed	\$2,763 (est)	\$550

1  
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Reason To Believe Recommendation - 2014 )  
12 Day Pre-General Report (Unauthorized )  
Quarterly Filers) for the Administrative )  
Fine Program:  
BOYD GAMING POLITICAL ACTION ) AF# 2910  
COMMITTEE, and DARNOLD, RICK as )  
treasurer;  
CHIANG PATEL AND YERBY INC PAC, ) AF# 2911  
and DAVID W HAYS as treasurer;  
DRINKER BIDDLE POLITICAL ACTION ) AF# 2912  
COMMITTEE, and TARNOW, )  
JONATHAN as treasurer;  
DRUMMOND COMPANY, INC. ) AF# 2913  
POLITICAL ACTION COMMITTEE )  
(DPAC), and STANFIELD, SCOTT O. )  
MR. as treasurer;  
FEDERAL FOREST RESOURCE ) AF# 2914  
COALITION PAC (FFRC PAC), and )  
IMBERGAMO, WILLIAM G. as treasurer;  
ICE PAC, and LEBEAU, REID as ) AF# 2915  
treasurer;  
M&T BANK AND WILMINGTON ) AF# 2916  
TRUST POLITICAL ACTION )  
COMMITTEE, and BROGGIO, JULIAN )  
MR. as treasurer;  
MOVING AMERICA FORWARD, and ) AF# 2917  
MITCHELL, JENNIFER G MS. as )  
treasurer;  
NATIONAL ASSOCIATION OF ) AF# 2918  
CHEMICAL DISTRIBUTORS )  
RESPONSIBLE DISTRIBUTION )  
POLITICAL ACTION CO, and LISA J. )  
VIENNA as treasurer; )

NATIONAL POTATO COUNCIL	) AF# 2919
POTATO POLITICAL ACTION	)
COMMITTEE, and KEELING, JOHN MR.	)
JR. as treasurer;	)
NEW TRIER DEMOCRATIC	) AF# 2920
ORGANIZATION, and UNGASHICK,	)
JOHN MICHAEL as treasurer;	)
PROGRESSIVE VOTERS OF AMERICA,	) AF# 2921
and FIERMONTE, F. PHILIP as treasurer;	)

VIGOR PAC, and LUBY, TAYLOR	) AF# 2923
CHRISTINE as treasurer;	)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 31, 2015 the Commission took the following actions on the Reason To Believe Recommendation - 2014 12 Day Pre-General Report (Unauthorized Quarterly Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 27, 2015, on the following committees:

AF#2910 Decided by a vote of 6-0 to: (1) find reason to believe that BOYD GAMING POLITICAL ACTION COMMITTEE, and DARNOLD, RICK as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2911 Decided by a vote of 6-0 to: (1) find reason to believe that CHIANG PATEL AND YERBY INC PAC, and DAVID W HAYS as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2912 Decided by a vote of 6-0 to: (1) find reason to believe that DRINKER BIDDLE POLITICAL ACTION COMMITTEE, and TARNOW, JONATHAN as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

15002705041  
AF#2913 Decided by a vote of 6-0 to: (1) find reason to believe that DRUMMOND COMPANY, INC. POLITICAL ACTION COMMITTEE (DPAC), and STANFIELD, SCOTT O. MR. as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2914 Decided by a vote of 6-0 to: (1) find reason to believe that FEDERAL FOREST RESOURCE COALITION PAC (FFRC PAC), and IMBERGAMO, WILLIAM G. as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2915 Decided by a vote of 6-0 to: (1) find reason to believe that ICE PAC, and LEBEAU, REID as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2916 Decided by a vote of 6-0 to: (1) find reason to believe that M&T BANK AND WILMINGTON TRUST POLITICAL ACTION COMMITTEE, and BROGGIO, JULIAN MR. as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2917 Decided by a vote of 6-0 to: (1) find reason to believe that MOVING AMERICA FORWARD, and MITCHELL, JENNIFER G MS. as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

1500927-00042

AF#2918 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL ASSOCIATION OF CHEMICAL DISTRIBUTORS RESPONSIBLE DISTRIBUTION POLITICAL ACTION CO, and LISA J. VIENNA as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2919 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL POTATO COUNCIL POTATO POLITICAL ACTION COMMITTEE, and KEELING, JOHN MR. JR. as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2920 Decided by a vote of 6-0 to: (1) find reason to believe that NEW TRIER DEMOCRATIC ORGANIZATION, and UNGASHICK, JOHN MICHAEL as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2921 Decided by a vote of 6-0 to: (1) find reason to believe that PROGRESSIVE VOTERS OF AMERICA, and FIERMONTE, F. PHILIP as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2923 Decided by a vote of 6-0 to: (1) find reason to believe that VIGOR PAC, and LUBY, TAYLOR CHRISTINE as treasurer violated 52 U.S.C. 30104(a) (formerly 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 Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission  
Certification for Administrative Fines  
March 31, 2015

Page 5

Attest:

April 1, 2015

Date

Shawn Woodhead Werth

Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 1, 2015

John Michael Ungashick, in official capacity as Treasurer  
New Trier Democratic Organization  
800 Oak St.  
Winnetka, IL 60093

C00422519  
AF#: 2920

Dear Mr. Ungashick:

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 October 1, 2014 through October 15, 2014, shall be filed no later than October 23, 2014. 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)). 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 November 4, 2014. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)). 52 U.S.C. § 30109(a)(4) (formerly 2 U.S.C. 437g(a)(4)). On March 31, 2015, the FEC found that there is reason to believe ("RTB") that New Trier Democratic Organization and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)) by failing to file timely this report on or before October 23, 2014. 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 \$660. 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 \$660 is due within forty (40) days of the finding, or by May 10, 2015, and is based on these factors:

Sensitivity of Report: Election Sensitive  
Level of Activity: \$6,445  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

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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1100927-05044

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 10, 2015. 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 52 U.S.C. § 30109 (formerly 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 New Trier Democratic Organization and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 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 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.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

**5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2) (formerly 2 U.S.C. § 437g(a)(2)). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) (formerly 2 U.S.C. § 437g(a)(4)(B)) and 30109(a)(12)(A) (formerly 437g(a)(12)(A)) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

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,



Ann M. Ravel  
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 \$660 for the 2014 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 May 10, 2015. 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**

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FOR: New Trier Democratic Organization

FEC ID#: C00422519

AF#: 2920

PAYMENT DUE DATE: May 10, 2015

PAYMENT AMOUNT DUE: \$660

NEW TRIER DEMOCRATIC ORGANIZATION-FED.

DEAN T. MARAGOS, COMMITTEEMAN  
JUDY MANDEL, PRESIDENT

800 OAK STREET  
WINNETKA, ILLINOIS 60093  
Ph. 847.446.8030  
Web Address. [www.ntdo.org](http://www.ntdo.org)  
Email: [newtrierdemocrats@gmail.com](mailto:newtrierdemocrats@gmail.com)

ELECTED OFFICIALS

CONGRESSWOMAN JAN SCHAKOWSKY  
STATE SENATOR DANIEL BISS  
STATE SENATOR JULIE MORRISON  
REPRESENTATIVE SCOTT DRURY  
REPRESENTATIVE LAURA FINE  
REPRESENTATIVE ROBYN GABEL  
COMMISSIONER LARRY SUFFREDIN

SUSTAINING MEMBERS:

Lynn Abramson and Bill Crowley  
Tony Augustine  
Joan and Julian Berman  
Sheila and Bob Berner  
Ruth and Bob Berns  
Doris and Stuart Bernstein  
Gloria Callaci and Larry Suffredin  
Pat Collins and Ed Bancroft  
Patrice and William Brandt  
Carmen and Bob Corbett  
Peg and Phil Corboy  
Quinn and Robert Delaney  
Arlene and Morton Doblin  
Sally and Larry Domont  
Jean and Dick Doub  
Rosann and Robert Drucker  
Peter Eatherton  
Nancy and Arnee Eisenberg  
Susanna and Helmut Epp  
Marcia Blumenthal Fields  
Carol and David Golder  
Zoe and Jim Griffith  
Adrienne Hahn  
Harriet Hahn  
David Harrington  
Miyako Hasegawa and Dan Seals  
Heather and Geoff Higgins  
Paul Homer  
Joni Johnson  
Sheila and Chris Kennedy  
Christine and Mark Kraemer  
Ruth Krugly and Darryl Davidson  
Deborah and Daniel Kubasiak  
Corrine and Fred Lane  
Katie and John MacCarthy  
Judy Mandel  
Toni and Dean Maragos  
Marcia and Jack Melamed  
Cathy and Jim Nowacki  
Cynthia and Stephen Ondra  
Les Ordman  
Luvian Owens  
George Pearce  
Rhoda and Dan Pierce  
Nancy Pred and Wade Thoma  
Merilee and Richard Redmond  
Harriet and Robert Richman  
Susan and Myron Rubnitz  
Trude and Jim Roselle  
Mary Ann and Bob Savard  
Mary and Charles Shea  
Peggy Slater  
Priscilla and Fred Sperling  
Sanford Stein  
Mary Stowell and Jim Streicker  
Julia Sweeney  
John Ungashick  
Betty and Stanley Weinberger  
Ann Wolff

April 14, 2015

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

Dear Federal Election Commission:

Enclosed you will find your letter (C00422519 AF# 920) referencing a 12 Day Pre-General Report of Receipts and Disbursements which was not filed. I realize that ignorance of the law is no excuse but I find your web site interface very confusing and was not aware that such a report was due in the middle of a month. All throughout 2014 I filed monthly reports for the New Trier Democratic Organization even though I was not technically required to do so. The report covering the full month of October 2014 was filed November 7, 2014 (FEC-972629). It contained all information for the period October 1st through October 15th which was required in the Pre-General Report. I went to your web site but was unable to file the Pre-General report as all the information was already included in the monthly report. In any event we had only one contribution to a federal candidate; a \$1,000 check on October 10th for Bradley Schneider, a candidate for the 9th Illinois Congressional District.

With the above in mind, I request that you abate any penalties due for our failure to file the Pre-General Report.

Sincerely,



John Ungashick

Treasurer

RECEIVED  
FEC MAIL CENTER  
2015 APR 20 AM 7:29



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 1, 2015

John Michael Ungashick, Treasurer  
New Trier Democratic Organization  
800 Oak St.  
Winnetka, IL 60093

C00422519  
AF#: 2920

Dear Mr. Ungashick:

On April 20, 2015, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") for New Trier Democratic Organization and you, in your official capacity as Treasurer, which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

Sincerely,

*Rhiannon Magruder*

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

June 17, 2015

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *AP*  
Staff Director

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

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: AF# 2920 – New Trier Democratic Organization, and John Michael Ungashick, in his official capacity as Treasurer (C00422519)

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 17, 2015

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

AF# 2920 – New Trier Democratic Organization, and John Michael Ungashick, in his official capacity as Treasurer (C00422519)

**Summary of Recommendation**

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$660 civil money penalty.

**Reason-to-Believe Background**

The 2014 Pre-General Report covering October 1 through October 15, 2014 was due on October 23, 2014. On November 7, 2014, the Committee filed the 2014 November Monthly Report covering the period of October 1 through October 31, 2014. The Committee disclosed activity which should have been reported on the 2014 Pre-General Report. The 2014 Pre-General Report is election sensitive. Since the activity was not filed prior to four days before the November 4, 2014 General Election, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2).

On March 31, 2015, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to timely file the 2014 Pre-General Report and made a preliminary determination that the civil money penalty was \$660 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on April 1, 2015 to notify them of the Commission's RTB finding and civil money penalty.

**Legal Requirements**

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee not authorized by a candidate which is filing on a quarterly basis shall file a pre-election report no later than the 12<sup>th</sup> day before any election in which the committee makes contributions or expenditures in connection with such election if such disbursements have not been previously disclosed. The treasurer of a political committee not authorized by a candidate which is filing on a monthly basis must file a pre-election report no later than the 12th day before any election. The report shall disclose all receipts and disbursements as of the 20th day before the election. 52 U.S.C. § 30104(a)(4) (formerly 2 U.S.C. § 434(a)(4)) and 11 C.F.R. § 104.5(c). The Pre-General Report is an election sensitive report pursuant to 11 C.F.R. § 111.43(d)(1). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 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).

### **Summary of Respondents' Challenge**

On April 20, 2015, the Commission received the written response ("challenge") from the Treasurer. The Treasurer acknowledges that ignorance of the law is not an excuse but asks the Commission to abate the civil money penalty.

The Treasurer states that he finds the Commission's website confusing, and he was not aware of the Pre-General Report filing requirement. He further explains that the Committee has been filing on a monthly basis but is not required to do so. The Committee filed the 2014 November Monthly Report on November 7, 2014, and the report included the 2014 Pre-General coverage period of October 1 through October 15. The Committee made a single \$1,000 contribution to a federal candidate during that period.

### **Analysis**

The Committee transitioned from a monthly filer to a quarterly filer in January 2013. However, as acknowledged by the respondents in the challenge, the Committee has filed all of its 2014 reports on a monthly basis. Subsequent to each monthly filing, RAD sent a Request for Additional Information ("RFAI") to the Committee stating:

"Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule."

According to RAD telecoms (written records of telephone conversations), on December 2, 2014, a RAD Compliance Analyst explained to the Treasurer that the Committee was registered as a quarterly filer and should respond to the outstanding RFAIs by submitting a filing frequency change notice if it wished to file on a monthly basis. The Treasurer indicated he would continue to file monthly but has failed to respond to the RFAIs.

Regardless of the Committee's filing frequency, the Committee was subject to the 2014 Pre-General Report filing requirement. The Act states that a political committee not authorized by a candidate which is filing on a quarterly basis shall file a pre-election report no later than the 12<sup>th</sup> day before any election in which the committee makes contributions or expenditures in connection with such election if such disbursements have not been previously disclosed. A political committee not authorized by a candidate which is filing on a monthly basis must file a pre-election report no later than the 12th day before any election, regardless of the existence and nature of the activity. 52 U.S.C. § 30104(a)(4) (formerly 2 U.S.C. § 434(a)(4)) and 11 C.F.R. § 104.5(c).

The Treasurer contends the Commission's website interface is confusing, and he was unaware that a report would be "due in the middle of the month." However, the respondents should have been aware of the reporting requirement. The Committee correctly filed the 2008 Pre-General Report as a quarterly filer. In addition, the Committee correctly filed the 2010 and 2012 Pre-General Reports as a monthly filer. The Reviewing Officer recognizes that Mr. Ungashick was not Treasurer during those periods, but the Commission has also sent multiple notifications to the Committee regarding the 2014 Pre-General Report filing requirement since he became Treasurer on June 7, 2013.

The Commission's Information Division acknowledges that it failed to send the 2014 General Election Prior Notice to the Committee due to a technical error. However, the Information Division did previously notify the respondents of the reporting requirement on three separate occasions. The Information Division sent email reminders concerning the 2014 April, July, and October Quarterly Reports to "newtrierdems@sbcglobal.net" on March 22, June 25, and September 21, 2015, respectively. Each of these notices referenced the 2014 Pre-General Report and the filing requirements as a quarterly filer. The notices explained that a political action committee was required to file the 2014 Pre-General Report "...only if [the] committee makes contributions or expenditures in connection with the general election during the reporting period. See 11 CFR 104.5(c)(1)(ii)."

The respondents were reminded of the 2014 Pre-General reporting requirement on October 21, 2014. According to the Manager of the Electronic Filing and Disclosure Branch in the Commission's Office of the Chief Information Officer, the Electronic Filing Office ("EFO") sent a reminder email to "newtrierdems@sbcglobal.net," the email address previously provided by the Committee to EFO. The email stated: "Please note, Electronic filers have until 11:59 (EDT) on Thursday, October 23 to submit their 12 Day Pre-General Report on time."<sup>1</sup>

On November 7, 2014, the Committee filed the 2014 November Monthly Report covering the period of October 1 through October 31, 2014. As mentioned in the challenge, the Committee disclosed a \$1,000 contribution made to a federal candidate participating in the 2014 General Election. The contribution was made on October 10, 2014; therefore, the Committee was required to file the 2014 Pre-General Report covering October 1 through October 15, 2014 by October 23, 2014. Based on the activity disclosed in the 2014 November Monthly Report, the Commission calculates the level of activity for the 2014 Pre-General Report to be \$6,445. The 2014 Pre-General Report is considered not filed because the report is election sensitive and the activity was not filed prior to four days before the November 4, 2014 General Election. 11 C.F.R. §§ 111.43(d)(1) and (e)(2).

The Commission notified the respondents of their requirement to file the 2014 Pre-General Report on several occasions. Negligence and failure to know reporting dates are included at 11 C.F.R. § 111.35(d) as examples of circumstances that will not be considered reasonably unforeseen and beyond the respondents' control. Their challenge fails to address any of the three valid grounds at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on

<sup>1</sup> The Committee did not receive a failure to file notification for the 2014 Pre-General Report after the filing deadline. The Commission only sends failure to file notifications on the Pre-General Report to those committees that are required to file the report regardless of activity.

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. 11 C.F.R. § 111.35(b). Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$660 civil money penalty.

### **OAR Recommendations**

- 1) Adopt the Reviewing Officer recommendation for AF# 2920 involving New Trier Democratic Organization and John Michael Ungashick, in his official capacity as Treasurer in making the final determination;
- 2) Make a final determination in AF# 2920 that New Trier Democratic Organization and John Michael Ungashick, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$660 civil money penalty; and
- 3) Send the appropriate letter.

### **Attachments**

Attachment 1 –

Attachment 2 –

Attachment 3 –

Attachment 4 – Declaration from RAD

Attachment 5 – Declaration from OAR

**DECLARATION OF KRISTIN D. ROSER**

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 initial processing of 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 New Trier Democratic Organization:
  - A) Acknowledgement of Filing Frequency Change, dated January 18, 2013 (sent via electronic mail to: [newtrierdems@sbcglobal.net](mailto:newtrierdems@sbcglobal.net));
  - B) Request for Additional Information, dated March 10, 2014, referencing the 2014 February Monthly Report (sent via electronic mail to: [newtrierdems@sbcglobal.net](mailto:newtrierdems@sbcglobal.net));
  - C) Request for Additional Information, dated April 3, 2014, referencing the 2014 March Monthly Report (sent via electronic mail to: [newtrierdems@sbcglobal.net](mailto:newtrierdems@sbcglobal.net));
  - D) Request for Additional Information, dated May 19, 2014, referencing the 2014 May Monthly Report (sent via electronic mail to: [newtrierdems@sbcglobal.net](mailto:newtrierdems@sbcglobal.net));
  - E) Request for Additional Information, dated June 2, 2014, referencing the 2014 June Monthly Report (sent via electronic mail to: [newtrierdems@sbcglobal.net](mailto:newtrierdems@sbcglobal.net));
  - F) Request for Additional Information, dated July 16, 2014, referencing the 2014 July Monthly Report (sent via electronic mail to: [newtrierdems@sbcglobal.net](mailto:newtrierdems@sbcglobal.net));
  - G) Request for Additional Information, dated August 20, 2014, referencing the 2014 August Monthly Report (sent via electronic mail to: [newtrierdems@sbcglobal.net](mailto:newtrierdems@sbcglobal.net));
  - H) Request for Additional Information, dated September 15, 2014, referencing the 2014 September Monthly Report (sent via electronic mail to: [newtrierdems@sbcglobal.net](mailto:newtrierdems@sbcglobal.net));

100-027-0001

- I) Request for Additional Information, dated October 19, 2014, referencing the 2014 October Monthly Report (sent via electronic mail to: newtrierdems@sbcglobal.net);
- J) Request for Additional Information, dated November 17, 2014, referencing the 2014 November Monthly Report (sent via electronic mail to: newtrierdems@sbcglobal.net);
- K) Reason-to-Believe Letter, dated April 1, 2015 referencing the 2014 12 Day Pre-General Report (sent via overnight mail to the address of record).

3. I hereby certify that I have searched the Commission's public records and find that New Trier Democratic Organization filed the 2014 November Monthly Report, covering October 1, 2014 through October 31, 2014, with the Commission on November 7, 2014. This report included the required coverage dates for the 2014 12 Day Pre-General Report, October 1, 2014 through October 15, 2014.

4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 15<sup>th</sup> day of June, 2015.

Kristin D. Roser

Kristin D. Roser  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-O

January 18, 2013

DANIEL M. KAPLAN, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

IDENTIFICATION NUMBER: C00422519

REFERENCE: CHANGE TO QUARTERLY FILER

Dear Treasurer:

The Commission has received notification of your 1/14/2013 request to change from a Monthly filer to a Quarterly filer of receipts and disbursements.

Please note that during years that have no scheduled federal election, quarterly filers are required only to file semi-annually. Please be advised that under Section 104.5(c) of the Commission regulations, a committee may change its filing frequency no more than once per calendar year. Attached is a reporting schedule for the 2013 calendar year.

If you have any questions, please contact David Garr in the Reports Analysis Division on the toll free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). His local number is (202) 694-1137.

Sincerely,

Jodi Winship  
Chief, Compliance Branch  
Reports Analysis Division

**2013 Semi-Annual Filing Schedule**

Report Type	Coverage dates	Due Date
Mid-Year	1/1/2013 - 6/30/2013	7/31/2013
Year End	7/1/2013 - 12/31/2013	1/31/2014



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 10, 2014

JOHN MICHAEL UNGASHICK, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

**Response Due Date**

04/14/2014

IDENTIFICATION NUMBER: C00422519

REFERENCE: FEBRUARY MONTHLY REPORT (01/01/2014 - 01/31/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1137.

NEW TRIER DEMOCRATIC ORGANIZATION

Page 2 of 2

Sincerely,



David Garr  
Senior Campaign Finance Analyst  
Reports Analysis Division

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

April 3, 2014

JOHN MICHAEL UNGASHICK, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

**Response Due Date**  
**05/08/2014**

IDENTIFICATION NUMBER: C00422519

REFERENCE: MARCH MONTHLY REPORT (02/01/2014 - 02/28/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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NEW TRIER DEMOCRATIC ORGANIZATION

Page 2 of 2

Sincerely,



David Garr  
Senior Campaign Finance Analyst  
Reports Analysis Division

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

May 19, 2014

JOHN MICHAEL UNGASHICK, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

IDENTIFICATION NUMBER: C00422519

**Response Due Date**  
**06/23/2014**

REFERENCE: MAY MONTHLY REPORT (04/01/2014 - 04/30/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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NEW TRIER DEMOCRATIC ORGANIZATION

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Sincerely,



David Garr  
Senior Campaign Finance Analyst  
Reports Analysis Division

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 2, 2014

JOHN MICHAEL UNGASHICK, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

**Response Due Date**

07/07/2014

IDENTIFICATION NUMBER: C00422519

REFERENCE: JUNE MONTHLY REPORT (05/01/2014 - 05/31/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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NEW TRIER DEMOCRATIC ORGANIZATION

Page 2 of 2

Sincerely,



David Garr  
Senior Campaign Finance Analyst  
Reports Analysis Division

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

July 16, 2014

JOHN MICHAEL UNGASHICK, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

**Response Due Date**

08/20/2014

IDENTIFICATION NUMBER: C00422519

REFERENCE: JULY MONTHLY REPORT (06/01/2014 - 06/30/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1137.

NEW TRIER DEMOCRATIC ORGANIZATION

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Sincerely,



David Garr  
Senior Campaign Finance Analyst  
Reports Analysis Division

659



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

August 20, 2014

JOHN MICHAEL UNGASHICK, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

**Response Due Date**

09/24/2014

IDENTIFICATION NUMBER: C00422519

REFERENCE: AUGUST MONTHLY REPORT (07/01/2014 - 07/31/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1137.

NEW TRIER DEMOCRATIC ORGANIZATION

Page 2 of 2

Sincerely,



David Garr  
Senior Campaign Finance Analyst  
Reports Analysis Division

659



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 15, 2014

JOHN MICHAEL UNGASHICK, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

**Response Due Date**

10/20/2014

IDENTIFICATION NUMBER: C00422519

REFERENCE: SEPTEMBER MONTHLY REPORT (08/01/2014 - 08/31/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1137.

1009270071

NEW TRIER DEMOCRATIC ORGANIZATION

Page 2 of 2

Sincerely,



David Garr  
Senior Campaign Finance Analyst  
Reports Analysis Division

659

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

October 19, 2014

JOHN MICHAEL UNGASHICK, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

IDENTIFICATION NUMBER: C00422519

**Response Due Date**

11/24/2014

REFERENCE: OCTOBER MONTHLY REPORT (09/01/2014 - 09/30/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1137.

NEW TRIER DEMOCRATIC ORGANIZATION

Page 2 of 2

Sincerely,



David Garr  
Senior Campaign Finance Analyst  
Reports Analysis Division

659



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 17, 2014

JOHN MICHAEL UNGASHICK, TREASURER  
NEW TRIER DEMOCRATIC ORGANIZATION  
800 OAK ST.  
WINNETKA, IL 60093

IDENTIFICATION NUMBER: C00422519

**Response Due Date**

12/22/2014

REFERENCE: NOVEMBER MONTHLY REPORT (10/01/2014 - 10/31/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Records at the Commission indicate that your committee should be following a quarterly filing schedule; however, the report you have recently filed indicates that you are following a monthly filing schedule. Please be advised that 11 CFR §104.5(c) requires political committees to notify the Commission prior to changing its reporting schedule. Please provide further clarification regarding your committee's filing schedule.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1137.

NEW TRIER DEMOCRATIC ORGANIZATION

Page 2 of 2

Sincerely,



David Garr  
Senior Campaign Finance Analyst  
Reports Analysis Division

659

## DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A political committee not authorized by a candidate which is filing on a quarterly basis shall file a pre-general election report no later than the 12<sup>th</sup> day before the general election in which the committee makes contributions or expenditures in connection with such election if such disbursements have not been previously disclosed. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on October 23, 2014 for the 2014 12 Day Pre-General Report to be timely filed.
- 3) It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
- 4) 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) Statement of Organization filed by New Trier Democratic Organization, and John Michael Ungashick, in his official capacity as Treasurer. According to the Commission's records, the document was received on June 7, 2013, and names John Michael Ungashick as Treasurer.
  - b) Report Cover Page for the 2008 Pre-General Report electronically filed by New Trier Democratic Organization. According to the Commission's records, the report covers the period from October 1 through 15, 2008 and was received on October 16, 2008.
  - c) Report Cover Page for the 2010 Pre-General Report electronically filed by New Trier Democratic Organization. According to the Commission's records, the report covers the period from October 1 through 13, 2010 and was received on October 18, 2010.
  - d) Report Cover Page for the 2012 Pre-General Report electronically filed by New Trier Democratic Organization. According to the Commission's records, the report covers the period from October 1 through 17, 2012 and was received on October 25, 2012.

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- e) Report Cover Page, Summary Page, Detailed Summary Pages, and Schedule B for the 2014 November Monthly Report electronically filed by New Trier Democratic Organization, and John Michael Ungashick, in his official capacity as Treasurer. According to the Commission's records, the report covers the period from October 1 through 31, 2014 and was received on November 7, 2014.
- 5) 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, D.C. on the 17th day of June, 2015.

Rhiannon Magruder

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

FEC  
FORM 1STATEMENT OF  
ORGANIZATION

Office Use Only

1. NAME OF  
COMMITTEE (in full) (Check if name  
is changed) Example: If typing, type  
over the lines.

12FE4M5

New Trier Democratic Organization

ADDRESS (number and street)

800 Oak St.

◀ (Check if address  
is changed)

Winnetka

CITY ▲

IL

60093

STATE ▲

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

◀ (Check if address  
is changed)

newtrierdems@sbcglobal.net

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

www.ntdo.org

2. DATE 12 29 2008

3. FEC IDENTIFICATION NUMBER ►

C 00422519

4. IS THIS STATEMENT  NEW (N)  OR  AMENDED (A)

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

Type or Print Name of Treasurer Daniel M. Kaplan

Signature of Treasurer

Daniel M. Kaplan

/Electronically Filed/

Date

06 07 2013

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.  
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.Office  
Use  
OnlyFor further information contact:  
Federal Election Commission  
Toll Free 800-424-9530  
Local 202-694-1100FEC FORM 1  
(Revised 06/2012)





Full Name of  
Designated  
Agent

Joan S. Berman

Mailing Address

265 Beach

Glencoe

CITY

STATE

60022

ZIP CODE

Title or Position

Assistant Treasurer

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

JPMorgan Chase

Mailing Address

791 Elm Street

Winnetka

CITY

STATE

60093

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

FEC  
FORM 3XREPORT 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 <input checked="" type="checkbox"/>		Example: If typing, type over the lines		
New Trier Democratic Organization					
ADDRESS (number and street)	800 Oak St.				
Check if different than previously reported. (ACC)	Winnetka	IL	60093		
2. FEC IDENTIFICATION NUMBER	CITY	STATE	ZIPCODE		
C00422519					
3. IS THIS REPORT	<input checked="" type="checkbox"/> NEW (N)	<input type="checkbox"/> OR	<input type="checkbox"/> AMENDED (A)		
4. TYPE OF REPORT (Choose One)	(b) Monthly Report Due On:	Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
(a) Quarterly Reports:		Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
April 15 Quarterly Report(Q1)		Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	Jan 31 (YE)
July 15 Quarterly Report(Q2)	(c) 12-Day PRE-Election Report for the:	Primary (12P)	<input checked="" type="checkbox"/> General (12G)		Runoff (12R)
October 15 Quarterly Report(Q3)		Convention (12C)	<input type="checkbox"/> Special (12G)		
January 31 Quarterly Report(YE)	Election on	11 04 2008		in the State of	IL
July 31 Mid-Year Report(Non-election Year Only) (MY)	(d) 30-Day Post-Election Report for the:	General (30G)	<input type="checkbox"/> Runoff (30R)	<input type="checkbox"/> Special (30S)	
Termination Report (TER)	Election on			in the State of	
5. Covering Period	10 01 2008	through	10 15 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 Joan S. BermanSignature of Treasurer Electronically Filed by Joan S. Berman Date 10 16 2008

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. 12/2004)

FEC  
FORM 3XREPORT 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	Office Use Only				
New Trier Democratic Organization							
ADDRESS (number and street)	800 Oak St,						
Check if different than previously reported. (ACC)	Winnetka	IL	60093				
2. FEC IDENTIFICATION NUMBER	CITY	STATE	ZIPCODE				
C00422519							
4. TYPE OF REPORT (Choose One)	3. IS THIS REPORT	<input checked="" type="checkbox"/> NEW (N)	<input type="checkbox"/> OR	<input type="checkbox"/> AMENDED (A)			
(a) Quarterly Reports:	(b) Monthly Report Due On:	<input type="checkbox"/> Feb 20 (M2)	<input type="checkbox"/> May 20 (M5)	<input type="checkbox"/> Aug 20 (M8)	<input type="checkbox"/> Nov 20 (M11) (Non-Election Year Only)		
April 15 Quarterly Report(Q1)	<input type="checkbox"/> Mar 20 (M3)	<input type="checkbox"/> Jun 20 (M6)	<input type="checkbox"/> Sep 20 (M9)	<input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only)			
July 15 Quarterly Report(Q2)	<input type="checkbox"/> Apr 20 (M4)	<input type="checkbox"/> Jul 20 (M7)	<input type="checkbox"/> Oct 20 (M10)	<input type="checkbox"/> Jan 31 (YE)			
October 15 Quarterly Report(Q3)	(c) 12-Day PRE-Election Report for the:	<input type="checkbox"/> Primary (12P)	<input checked="" type="checkbox"/> General (12G)	<input type="checkbox"/> Runoff (12R)			
January 31 Quarterly Report(YE)	<input type="checkbox"/> Convention (12C)	<input type="checkbox"/> Special (12S)					
July 31 Mid-Year Report(Non-election Year Only) (MY)	Election on	<input type="checkbox"/> 11	<input type="checkbox"/> 02	<input type="checkbox"/> 2010	in the State of		
Termination Report (TER)					IL		
5. Covering Period	10	01	2010	through	10	13	2010

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 Daniel M. Kaplan

Signature of Treasurer Electronically Filed by Daniel M. Kaplan Date 10 18 2010

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						
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FEC FORM 3X  
(Rev. 12/2004)

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

New Trier Democratic Organization

ADDRESS (number and street) 800 Oak St.

Check if different than previously reported. (ACC)

Winnetka

IL

60093

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00422519

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  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)

(b) Monthly Report Due On:	<input type="checkbox"/> Feb 20 (M2)	<input type="checkbox"/> May 20 (M5)	<input type="checkbox"/> Aug 20 (M8)	<input type="checkbox"/> Nov 20 (M11) (Non-Election Year Only)
	<input type="checkbox"/> Mar 20 (M3)	<input type="checkbox"/> Jun 20 (M6)	<input type="checkbox"/> Sep 20 (M9)	<input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only)
	<input type="checkbox"/> Apr 20 (M4)	<input type="checkbox"/> Jul 20 (M7)	<input type="checkbox"/> Oct 20 (M10)	<input type="checkbox"/> Jan 31 (YE)
(c) 12-Day PRE-Election Report for the:	<input type="checkbox"/> Primary (12P)	<input checked="" type="checkbox"/> General (12G)	<input type="checkbox"/> Runoff (12R)	
	<input type="checkbox"/> Convention (12C)	<input type="checkbox"/> Special (12S)		
	Election on <input type="text" value="11"/> / <input type="text" value="06"/> / <input type="text" value="2012"/>		in the State of <input type="text" value="IL"/>	
(d) 30-Day POST-Election Report for the:	<input type="checkbox"/> General (30G)	<input type="checkbox"/> Runoff (30R)	<input type="checkbox"/> Special (30S)	
	Election on <input type="text" value="11"/> / <input type="text" value="06"/> / <input type="text" value="2012"/>		in the State of <input type="text" value="IL"/>	

5. Covering Period

10

01

2012

through

10

17

2012

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 Daniel M. Kaplan

Signature of Treasurer

Daniel M. Kaplan

[Electronically Filed]

Date

10 24 2012

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. 12/2004



**SUMMARY PAGE**  
**OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

New Trier Democratic Organization

Report Covering the Period: From: 

10	01	2014
----	----	------

 To: 

10	31	2014
----	----	------

	<b>COLUMN A</b> This Period	<b>COLUMN B</b> Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2014	16456.82	
(b) Cash on Hand at Beginning of Reporting Period.....	35514.06	
(c) Total Receipts (from Line 19) .....	14933.80	61000.40
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	50447.86	77457.22
7. Total Disbursements (from Line 31).....	3522.02	30531.88
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	46925.84	46925.84
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information contact:**

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

## DETAILED SUMMARY PAGE

## of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

New Trier Democratic Organization

Report Covering the Period: From: 10 01 2014

To: 10 31 2014

## I. Receipts

COLUMN A  
Total This PeriodCOLUMN B  
Calendar Year-to-Date

11. Contributions (other than loans) From:

- (a) Individuals/Persons Other Than Political Committees
  - (i) Itemized (use Schedule A).....
  - (ii) Unitemized.....
  - (iii) TOTAL (add Lines 11(a)(i) and (ii))..... ►
- (b) Political Party Committees .....
- (c) Other Political Committees (such as PACs).....
- (d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5) .....

12. Transfers From Affiliated/Other Party Committees.....

13. All Loans Received .....

14. Loan Repayments Received.....

15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....

16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....

17. Other Federal Receipts (Dividends, Interest, etc.).....

18. Transfers from Non-Federal and Levin Funds
 
  - (a) Non-Federal Account (from Schedule H3).....
  - (b) Levin Funds (from Schedule H5) .....
  - (c) Total Transfers (add 18(a) and 18(b)) .....

19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))..... ►

20. Total Federal Receipts (subtract Line 18(c) from Line 19) .....

10695.00	43920.00
3400.00	10370.00
14095.00	54290.00
0.00	0.00
0.00	0.00
14095.00	54290.00
0.00	4194.00
0.00	0.00
0.00	0.00
0.00	0.00
0.00	0.00
838.80	2516.40
0.00	0.00
838.80	2516.40
14933.80	61000.40
14095.00	58484.00

## 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) Allocated Federal/Non-Federal Activity (from Schedule H4)	0.00	0.00
(i) Federal Share .....	2522.02	29531.38
(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)) .....	2522.02	29531.38
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	1000.00	1000.00
24. Independent Expenditures (use Schedule E) .....	0.00	0.00
25. Coordinated Party Expenditures (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) Allocated Federal Election Activity (from Schedule H6)	0.00	0.00
(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))..	3522.02	30531.38
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	1000.00	1000.00

**DETAILED SUMMARY PAGE**  
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3) .....	14095.00	54290.00
34. Total Contribution Refunds (from Line 28(d)) .....	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33) .....	14095.00	54290.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3) .....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....	0.00	0.00

**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 15 OF 21

 21b 22 23 24 25 26  
 27 28a 28b 28c 29 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)**

New Trier Democratic Organization

Full Name (Last, First, Middle Initial)

**A. BRADLEY SCOTT SCHNEIDER**

Mailing Address 9 TAMARISK LANE

Date of Disbursement

 M M / D D / Y Y Y Y  
 10 10 2014

City DEERFIELD State IL Zip Code 60015

Transaction ID : SB23.9771

 Purpose of Disbursement  
 Political Contribution

Candidate Name

 Category/  
 Type

 Office Sought:  House  
 Senate  
 President Disbursement For:  
 Primary  General  
 Other (specify) ▼

State: IL District: 10

1000.00

Full Name (Last, First, Middle Initial)

Date of Disbursement

 M M / D D / Y Y Y Y  
 10 10 2014

Mailing Address

City State Zip Code

Amount of Each Disbursement this Period

Purpose of Disbursement

Candidate Name

 Office Sought:  House  
 Senate  
 President Disbursement For:  
 Primary  General  
 Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

Date of Disbursement

 M M / D D / Y Y Y Y  
 10 10 2014

Mailing Address

City State Zip Code

Amount of Each Disbursement this Period

Purpose of Disbursement

Candidate Name

 Office Sought:  House  
 Senate  
 President Disbursement For:  
 Primary  General  
 Other (specify) ▼

State: District:

SUBTOTAL of Disbursements This Page (optional) ►

1000.00

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

1000.00



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

15092708082  
June 17, 2015

John Michael Ungashick, Treasurer  
New Trier Democratic Organization  
800 Oak St.  
Winnetka, IL 60093

C00422519  
AF#: 2920

Dear Mr. Ungashick:

On March 31, 2015, the Federal Election Commission (“Commission”) found reason to believe (“RTB”) that New Trier Democratic Organization and you, in your official capacity as Treasurer (“respondents”), violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to file the 2014 Pre-General Report. The Commission also made a preliminary determination that the civil money penalty was \$660 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination. 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 or via facsimile (202-208-3333). 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,

*Rhiannon Magruder*  
Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review

## NEW TRIER DEMOCRATIC ORGANIZATION-FED.

800 OAK STREET

WINNETKA, ILLINOIS 60093 RECEIVED

Ph. 847.446.8050 FEDERAL ELECTION COMMISSION

SECRETARIAT

Web Address. [www.ntdo.org](http://www.ntdo.org)Email: [newtrierdemocrats@gmail.com](mailto:newtrierdemocrats@gmail.com)

ELECTED OFFICIALS:

DEAN T. MARAGOS, COMMITTEEMAN  
JUDY MANDEL, PRESIDENTCONGRESSWOMAN JAN SCHAKOWSKY  
STATE SENATOR DANIEL BISS  
STATE SENATOR JULIE MORRISON  
REPRESENTATIVE SCOTT DRURY  
REPRESENTATIVE LAURA FINE  
REPRESENTATIVE ROBYN GABEL  
COMMISSIONER LARRY SUFFREDIN

2015 JUN 25 AM 8:51

## SUSTAINING MEMBERS:

Lynn Abrahamson and Bill Crowley

Tony Augustine

Joan and Julian Berman

Sheila and Bob Berner

Ruth and Bob Berns

Doris and Stuart Bernstein

Gloria Callaci and Larry Suffredin

Pat Collins and Ed Bancroft

Palrice and William Brandt

Carmen and Bob Corbett

Peg and Phil Corboy

Quinn and Robert Delaney

Arline and Morton Dobkin

Sally and Larry Domont

Jean and Dick Doub

Rosann and Robert Drucker

Peter Eatherton

Nancy and Arnee Eisenberg

Susanna and Helmut Epp

Marcia Blumenthal Fields

Carol and David Golder

Zoe and Jim Griffith

Adrienne Hahn

Harriet Hahn

David Harrington

Miyako Hasegawa and Dan Seals

Heather and Geoff Higgins

Paul Homer

Joni Johnson

Sheila and Chris Kennedy

Christine and Mark Kraemer

Ruth Krugly and Darryl Davidson

Deborah and Daniel Kubasiak

Corrine and Fred Lane

Katie and John MacCarthy

Judy Mandel

Toni and Dean Maragos

Marcia and Jack Melamed

Cathy and Jim Nowacki

Cynthia and Stephen Ondra

Les Ordman

Luvian Owens

George Pearce

Rhoda and Dan Pierce

Nancy Pred and Wade Thoma

Merrilee and Richard Redmond

Harriet and Robert Richman

Susan and Myron Rubnitz

Trude and Jim Roselle

Mary Ann and Bob Savard

Mary and Charles Shea

Peggy Slatner

Priscilla and Fred Sperling

Sanford Stein

Mary Stowell and Jim Streicker

Julia Sweeney

John Ungashick

Betty and Stanley Weinberger

Ann Wolff

June 25, 2015

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

Dear Federal Election Commission:

Enclosed you will find the letter and reviewing officer recommendation (C00422519 AF#2920) sent to me on June 17, 2015. The mailing was accompanied by many pages of copies of emails sent to [newtrierdems@sbcglobal.net](mailto:newtrierdems@sbcglobal.net). This email address has not been used by us for several years and in fact has not been used since I became Treasurer in June 2013. I was not aware of any of the emails sent to the old address therefore I was not able to respond to them. I suspect it was our responsibility to notify you of our new email address which is [newtrierdemocrats@gmail.com](mailto:newtrierdemocrats@gmail.com) but the change was made before I came on the scene and since I never received any emails from you, I was unaware of the problem. We have had several different IT people and three office administrators in the last few years and one of them should have notified you of our new email address but this was not done. Our letterhead which was used to send you my response on April 14, 2014 does show the correct email address.

With the above in mind I would like to ask that you rescind any penalties due to our failure to file the Pre-General Report.

Sincerely



John Ungashick

Treasurer



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2015 JUL -1 AM 11:03

**SENSITIVE**

July 1, 2015

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *AP*  
Staff Director

From: Patricia C. Orrock *DC/PCO*  
Chief Compliance Officer

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2920 – New Trier Democratic Organization, and John Michael Ungashick, in his official capacity as Treasurer (C00422519)

On March 31, 2015, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to timely file the 2014 Pre-General Report and made a preliminary determination that the civil money penalty was \$660 based on the schedule of penalties at 11 C.F.R. § 111.43.

On April 20, 2015, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated June 17, 2015 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. They submitted no evidence that a factual error was made in the RTB finding, that the penalty was miscalculated at RTB, or that they used best efforts to file on time, 11 C.F.R. § 111.35(b). Therefore, the Reviewing Officer recommended that the Commission make a final determination that they violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$660 civil money penalty.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On June 25, 2015, the respondents submitted a response to the ROR. The Treasurer states that the official email address on file with the Commission is out of date and further explains:

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9  
4

150927-000001

"This email address has not been used by us for several years and in fact has not been used since I became Treasurer in June 2013. I was not aware of any of the emails sent to the old address therefore I was not able to respond to them. I suspect it was our responsibility to notify you of our new email address which is newtrierdemocrats@gmail.com but the change was made before I came on the scene and since I never received any emails from you, I was unaware of the problem. We have had several different IT people and three office administrators in the last few years and one of them should have notified you of our new email address but this was not done. Our letterhead which was used to send you my response on April 14, 2014 does show the correct email address.

With the above in mind I would like to ask that you reseind any penalties due to our failure to file the Pre-General Report."

The Commission's Information Division and Electronic Filing Office ("EFO") appropriately sent the relevant email notifications to "newtrierdems@sbeglobal.net." The Reviewing Officer recognizes that "newtrierdems@sbeglobal.net" may no longer be the Committee's email address, but the Committee's most recent Amended Statement of Organization filed on June 6, 2013 discloses "newtrierdems@sbeglobal.net" as the Committee's official email address. The treasurer of a politieal committee shall be personally responsible for timely and complete filings and for the accuracy of any information contained in those filings. 11 C.F.R. § 104.14(d). Page 9 of the Commission's *Campaign Guide for Political Party Committees* further explains: "Whenever any of the information on the Statement of Organization (Form 1) changes, the committee must report the change within 10 days by filing an amended Form 1..."

In response to the Treasurer's contention that he was not aware of the emails being sent to "newtrierdems@sbeglobal.net." the Reviewing Officer notes that RAD telecoms (written records of telephone conversations) indicate otherwise. On December 2, 2014, the Treasurer called RAD in response to a reminder email regarding the 2014 Post-General Report. According to the Manager of the Electronic Filing and Disclosure Branch in the Commission's Office of the Chief Information Officer, EFO sent a reminder email to "newtrierdems@sbeglobal.net" on December 1, 2014. The email stated: "Please note, Electronic filers have until 11:59 (EDT) on Thursday, December 4 to submit their 2014 Post-General Report on time." The Treasurer's acknowledgement of this email indicates he should have also received the previous email notifications mentioned in the ROR.

Negligence and failure to know reporting dates are included at 11 C.F.R. § 111.35(d) as examples of circumstances that will not be considered reasonably unforeseen and beyond the respondents' control. Their challenge and response to the ROR fail to address any of the three valid grounds 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 moncy 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. 11 C.F.R. § 111.35(b). Therefore, the Reviewing Officer recommends that the

Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$660 civil money penalty.

#### **OAR Recommendations**

- 1) Adopt the Reviewing Officer recommendation for AF# 2920 involving New Trier Democratic Organization and John Michael Ungashick, in his official capacity as Treasurer in making the final determination;
- 2) Make a final determination in AF# 2920 that New Trier Democratic Organization and John Michael Ungashick, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$660 civil money penalty; and
- 3) Send the appropriate letter.

# BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Final Determination Recommendation – ) AF 2920  
New Trier Democratic Organization, and )  
John Michael Ungashick, in his official )  
capacity as Treasurer (C00422519) )

## CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 16, 2015, the Commission decided by a vote of 6-0 to take the following actions in AF 2920:

1. Adopt the Reviewing Officer recommendation for AF# 2920 involving New Trier Democratic Organization and John Michael Ungashick, in his official capacity as Treasurer in making the final determination.
2. Make a final determination in AF# 2920 that New Trier Democratic Organization and John Michael Ungashick, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a \$660 civil money penalty.
3. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

July 16, 2015

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



**FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463**

July 21, 2015

John Michael Ungashick, Treasurer  
New Trier Democratic Organization  
800 Oak St.  
Winnetka, IL 60093

C00422519  
AF#: 2920

Dear Mr. Ungashick:

On March 31, 2015, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that New Trier Democratic Organization and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to file the 2014 Pre-General Report. By letter dated April 1, 2015, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$660 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On April 20, 2015, 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 your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that New Trier Democratic Organization and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty in the amount of \$660 in accordance with 11 C.F.R. § 111.43. A copy of the Reviewing Officer Recommendation was sent to you on June 17, 2015.

On July 16, 2015, the Commission adopted the Reviewing Officer's recommendation and made a final determination that New Trier Democratic Organization and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assessed a civil money penalty in the amount of \$660. A copy of the Final Determination Recommendation is attached.

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

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified

or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii) (formerly 2 U.S.C. § 437g(a)(4)(C)(iii)). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109 (formerly 2 U.S.C. § 437g). 11 CFR § 111.38.

**2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**

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

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

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

If you should decide to pay the civil money penalty, send the enclosed remittance form, along with your payment, to the address on page 4 within 30 days of receipt of this letter.

## **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### **4. Partial Payments**

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

### **5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) (formerly 2 U.S.C. § 437g(a)(12)) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Ann M. Ravel  
Chair

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## **ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$660 for the 2014 Pre-General Report.

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

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

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

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

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

### **PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your 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.

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### **PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

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FOR: New Trier Democratic Organization

FEC ID#: C00422519

AF#: 2920

PAYMENT AMOUNT DUE: \$660



FEDERAL ELECTION COMMISSION  
Washington DC 20463

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THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2940

DATE SCANNED 8/3/15

SCANNER NO. 2

SCAN OPERATOR 58