



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2950

DATE SCANNED 10/15/15

SCANNER NO. 2

SCAN OPERATOR TN



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2015 MAR 31 AM 9:12

March 30, 2015

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *Walt for*
Staff Director

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

Debbie Chacona *for PCO*
Assistant Staff Director
Reports Analysis Division

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

SUBJECT: Reason To Believe Recommendation - 2014 30 Day Post-General Report
(Unauthorized Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2014 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)). The list is comprised of unauthorized committees that failed to file or timely file the 2014 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, after the due date but within thirty (30) days of the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

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

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2014 through November 24, 2014 (55 days),

was reviewed for activity which would have required the filing of a 12 Day Pre-General Report (12 Day Report). If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 27% (15 days (12G Filing Period)/55 days (30G Filing Period)). The committees identified through this process as failing to file or failing to timely file the 12 Day Report were included in the Reason to Believe Recommendation circulated to the Commission on March 30, 2015. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Report based on the estimated levels of activity described above and are included on the attached list.

Recommendation

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

Federal Election Commission
Reason to Believe Circulation Report
2014 POST-GENERAL Not Election Sensitive 12/04/2014 UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2924	C00388157	AMERICAN COMPOSITES MANUFACTURERS ASSOCIATION POLITICAL ACTION COMMITTEE		TOM DOBBINS	\$121,785	0	12/17/2014	13	\$8,500	\$120
2925	C00398800	AMERICAN LIGHTING ASSOCIATION POLITICAL ACTION COMMITTEE		RICHARD D UPTON	\$124,395	0	1/12/2015	Not Filed	\$454	\$275
2926	C99002396	AMERICAN POLITICAL ACTION COMMITTEE		J.H. VERSNEL	\$384,311	0	1/6/2015	Not Filed	\$16,026	\$550
2927	C00420125	CHIANG PATEL AND YERBY INC PAC		DAVID W. HAYS	\$186,027	2	12/23/2014	19	\$12,250	\$307
2928	C00455741	DEEP BLUE		ROBERT MONSOUR	\$131,814	0	12/26/2014	22	\$59,990	\$2,365
2929	C00176420	DEMOCRATIC FOUNDATION OF ORANGE COUNTY		GLEN HATTON	\$268,359	0		Not Filed	\$42,187 (est)	\$1,090
2930	C00212308	DUCHOSSOIS GROUP PAC		MICHAEL E. FLANNERY	\$114,014	0	1/21/2015	Not Filed	\$1,768	\$275
2931	C00208249	EMPIRE DISTRICT ELECTRIC COMPANY POLITICAL ACTION COMMITTEE		LARRY JAY WILLIAMS	\$164,886	0	1/30/2015	Not Filed	\$9,850 (est)	\$330
2932	C00522821	EMPOWER CITIZENS NETWORK		ROBERT WAYNE WARTHER	\$102,072	0		Not Filed	\$20,414 (est)	\$550
2933	C00432930	FISCAL LEADERSHIP AND KNOWING ECONOMICS PAC		HIEU TRAN	\$660,472	0	12/10/2014	6	\$69,034	\$885
2934	C00555862	FOUNDATION FOR A GREATER AMERICA INC		JAMES P. HODGINS	\$343,706	0	1/6/2015	Not Filed	\$255,759	\$9,800
2935	C00354613	INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE		MARTIN MASCUILLI	\$137,155	2	1/28/2015	Not Filed	\$14,773	\$825
2936	C00534529	MEDICINAL CANNABIS SUPERPAC		JOSEPH CHARLES HOUSTON	\$112,885	0		Not Filed	\$507 (est)	\$275
2937	C00431429	MVP HEALTH CARE INC. FEDERAL PAC		JORDAN T. ESTEY	\$117,284	0	12/15/2014	11	\$7,089	\$110

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
2938	C00113811	NATIONAL ELECTRICAL CONTRACTORS ASSOCIATION POLITICAL ACTION COMMITTEE (NECAPAC)		TRACI M. PICKUS	\$2,765,656	0	12/29/2014	25	\$73,687	\$2,642
2939	C00024281	NORTH AMERICAN MEAT INSTITUTE POLITICAL ACTION COMMITTEE		PETE THOMSON	\$370,483	0	12/23/2014	19	\$4,379	\$122
2940	C00568246	OUR VOICES MATTER		CHARLES PASCAL THOMAS FREILING	\$100,037	0		Not Filed	\$100,037 (est)	\$4,950
2941	C00509489	PATRIOT SUPER PAC		THOMAS FREILING	\$116,793	1		Not Filed	\$23,359 (est)	\$687
2942	C00192849	PLUMBERS AND PIPEFITTERS LOCAL UNION 74		MARK R. PERMAR	\$233,108	1	1/30/2015	Not Filed	\$16,087 (est)	\$687
2943	C00568170	PRIORITIES FOR IOWA POLITICAL FUND		SARA CRAIG	\$2,499,429	0	12/17/2014	13	\$262,093	\$4,100
2944	C00406553	PROGRESSIVE VOTERS OF AMERICA		F. PHILIP FIERMONTE	\$915,165	0	1/30/2015	Not Filed	\$40,189	\$1,090

2946	C00349225	SPINE PAC OF THE NATIONAL ASSOCIATION OF SPINE SPECIALISTS		ERIC J. MUEHLBAUER	\$301,251	0	1/7/2015	Not Filed	\$10,710	\$550
2947	C00497842	STRATEGY PAC		JAMES MALCZEWSKI	\$665,172	0	12/10/2014	6	\$58,787	\$885
2948	C00555508	TAKEOVER SUPER PAC		THOMAS FREILING	\$102,224	0	1/16/2015	Not Filed	\$1,986	\$275
2949	C00132480	TAXICAB LIMOUSINE & PARATRANSIT ASSOCIATION POLITICAL ACTION COMMITTEE (TLPA PAC)		ALFRED B. LAGASSE III	\$103,283	0	12/29/2014	25	\$5,920	\$180
2950	C00542811	THE REAL CONSERVATIVES NATIONAL COMMITTEE		MICHAEL LEAHY	\$541,337	0	3/9/2015	Not Filed	\$669	\$275
2951	C00404137	UNIVERSITY PUBLIC ISSUES COMMITTEE AKA UPIC		PAUL T. SCHULTZ	\$198,252	0	12/19/2014	15	\$2,000	\$102
2952	C00381699	USINPAC		SANJAY K. PURI	\$109,300	0	1/15/2015	Not Filed	\$6,006 (est)	\$330

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2014)
30 Day Post-General Report (Unauthorized)
Filers) for the Administrative Fine Program:)
AMERICAN COMPOSITES) AF# 2924
MANUFACTURERS ASSOCIATION)
POLITICAL ACTION COMMITTEE, and)
TOM DOBBINS as treasurer;)
AMERICAN LIGHTING ASSOCIATION) AF# 2925
POLITICAL ACTION COMMITTEE, and)
RICHARD D UPTON as treasurer;)
AMERICAN POLITICAL ACTION) AF# 2926
COMMITTEE, and VERSNEL, J.H. as)
treasurer;)
CHIANG PATEL AND YERBY INC PAC,) AF# 2927
and DAVID W HAYS as treasurer;)
DEEP BLUE, and ROBERT MONSOUR as) AF# 2928
treasurer;)
DEMOCRATIC FOUNDATION OF) AF# 2929
ORANGE COUNTY, and HATTON,)
GLEN as treasurer;)
DUCHOSSOIS GROUP PAC, and) AF# 2930
FLANNERY, MICHAEL E. as treasurer;)
EMPIRE DISTRICT ELECTRIC) AF# 2931
COMPANY POLITICAL ACTION)
COMMITTEE, and LARRY JAY)
WILLIAMS as treasurer;)
EMPOWER CITIZENS NETWORK, and) AF# 2932
ROBERT WAYNE WARTHER as)
treasurer;)
FISCAL LEADERSHIP AND KNOWING) AF# 2933
ECONOMICS PAC, and TRAN, HIEU as)
treasurer;)
FOUNDATION FOR A GREATER) AF# 2934
AMERICA INC, and HODGINS, JAMES P)
MR. as treasurer;)

Federal Election Commission
Certification for Administrative Fines
April 01, 2015

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INT LONGSHOREMENS ASSOC (ILA)) AF# 2935
LOCAL 1291 POLITICAL ACTION)
COMMITTEE, and MARTIN MASCUILLI)
as treasurer;)
MEDICINAL CANNABIS SUPERPAC,) AF# 2936
and JOSEPH CHARLES HOUSTON as)
treasurer;)
MVP HEALTH CARE INC. FEDERAL) AF# 2937
PAC, and ESTEY, JORDAN T as treasurer;)
NATIONAL ELECTRICAL) AF# 2938
CONTRACTORS ASSOCIATION)
POLITICAL ACTION COMMITTEE)
(NECAPAC), and PICKUS, TRACI M.)
MRS. as treasurer;)
NORTH AMERICAN MEAT INSTITUTE) AF# 2939
POLITICAL ACTION COMMITTEE, and)
THOMSON, PETE MR. as treasurer;)
OUR VOICES MATTER, and CHARLES) AF# 2940
PASCAL as treasurer;)
PATRIOT SUPER PAC, and FREILING,) AF# 2941
THOMAS as treasurer;)
PLUMBERS AND PIPEFITTERS LOCAL) AF# 2942
UNION 74, and MR MARK R PERMAR as)
treasurer;)
PRIORITIES FOR IOWA POLITICAL) AF# 2943
FUND, and SARA CRAIG as treasurer;)
PROGRESSIVE VOTERS OF AMERICA,) AF# 2944
and FIERMONTE, F. PHILIP as treasurer;)

SPINE PAC OF THE NATIONAL) AF# 2946
ASSOCIATION OF SPINE SPECIALISTS,)
and MUEHLBAUER, ERIC J. MR. as)
treasurer;)
STRATEGY PAC, and MALCZEWSKI,) AF# 2947
JAMES as treasurer;)
TAKEOVER SUPER PAC, and THOMAS) AF# 2948
FREILING as treasurer;)
TAXICAB LIMOUSINE &) AF# 2949
PARATRANSIT ASSOCIATION)
POLITICAL ACTION COMMITTEE)
(TLPA PAC), and ALFRED B LAGASSE)
III as treasurer;)

THE REAL CONSERVATIVES) AF# 2950
NATIONAL COMMITTEE, and)
MICHAEL LEAHY as treasurer;)
UNIVERSITY PUBLIC ISSUES) AF# 2951
COMMITTEE AKA UPIC, and PAUL T)
SCHULTZ as treasurer;)
USINPAC, and PURI, SANJAY K as) AF# 2952
treasurer;)

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 01, 2015 the Commission took the following actions on the Reason To Believe Recommendation - 2014 30 Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated March 30, 2015, on the following committees:

AF#2924 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN COMPOSITES MANUFACTURERS ASSOCIATION POLITICAL ACTION COMMITTEE, and TOM DOBBINS 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#2925 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN LIGHTING ASSOCIATION POLITICAL ACTION COMMITTEE, and RICHARD D UPTON 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#2926 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN POLITICAL ACTION COMMITTEE, and VERSNEL, J.H. 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#2927 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#2928 Decided by a vote of 6-0 to: (1) find reason to believe that DEEP BLUE, and ROBERT MONSOUR 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#2929 Decided by a vote of 6-0 to: (1) find reason to believe that DEMOCRATIC FOUNDATION OF ORANGE COUNTY, and HATTON, GLEN 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#2930 Decided by a vote of 6-0 to: (1) find reason to believe that DUCHOSSOIS GROUP PAC, and FLANNERY, MICHAEL E. 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#2931 Decided by a vote of 6-0 to: (1) find reason to believe that EMPIRE DISTRICT ELECTRIC COMPANY POLITICAL ACTION COMMITTEE, and LARRY JAY WILLIAMS 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#2932 Decided by a vote of 6-0 to: (1) find reason to believe that EMPOWER CITIZENS NETWORK, and ROBERT WAYNE WARTHER 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#2933 Decided by a vote of 6-0 to: (1) find reason to believe that FISCAL LEADERSHIP AND KNOWING ECONOMICS PAC, and TRAN, HIEU 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#2934 Decided by a vote of 6-0 to: (1) find reason to believe that FOUNDATION FOR A GREATER AMERICA INC, and HODGINS, JAMES P 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#2935 Decided by a vote of 6-0 to: (1) find reason to believe that INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE, and MARTIN MASCUILLI 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#2936 Decided by a vote of 6-0 to: (1) find reason to believe that MEDICINAL CANNABIS SUPERPAC, and JOSEPH CHARLES HOUSTON 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#2937 Decided by a vote of 6-0 to: (1) find reason to believe that MVP HEALTH CARE INC. FEDERAL PAC, and ESTEY, JORDAN T 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#2938 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL ELECTRICAL CONTRACTORS ASSOCIATION POLITICAL ACTION COMMITTEE (NECAPAC), and PICKUS, TRACI M. MRS. 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#2939 Decided by a vote of 6-0 to: (1) find reason to believe that NORTH AMERICAN MEAT INSTITUTE POLITICAL ACTION COMMITTEE, and THOMSON, PETE 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#2940 Decided by a vote of 6-0 to: (1) find reason to believe that OUR VOICES MATTER, and CHARLES PASCAL 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#2941 Decided by a vote of 6-0 to: (1) find reason to believe that PATRIOT SUPER PAC, and FREILING, THOMAS 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#2942 Decided by a vote of 6-0 to: (1) find reason to believe that PLUMBERS AND PIPEFITTERS LOCAL UNION 74, and MR MARK R PERMAR 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#2943 Decided by a vote of 6-0 to: (1) find reason to believe that PRIORITIES FOR IOWA POLITICAL FUND, and SARA CRAIG 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#2944 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#2946 Decided by a vote of 6-0 to: (1) find reason to believe that SPINE PAC OF THE NATIONAL ASSOCIATION OF SPINE SPECIALISTS, and MUEHLBAUER, ERIC J. 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#2947 Decided by a vote of 6-0 to: (1) find reason to believe that STRATEGY PAC, and MALCZEWSKI, JAMES 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#2948 Decided by a vote of 6-0 to: (1) find reason to believe that TAKEOVER SUPER PAC, and THOMAS FREILING 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#2949 Decided by a vote of 6-0 to: (1) find reason to believe that TAXICAB LIMOUSINE & PARATRANSIT ASSOCIATION POLITICAL ACTION COMMITTEE (TLPA PAC), and ALFRED B LAGASSE III 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#2950 Decided by a vote of 6-0 to: (1) find reason to believe that THE REAL CONSERVATIVES NATIONAL COMMITTEE, and MICHAEL LEAHY 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#2951 Decided by a vote of 6-0 to: (1) find reason to believe that UNIVERSITY PUBLIC ISSUES COMMITTEE AKA UPIC, and PAUL T SCHULTZ 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#2952 Decided by a vote of 6-0 to: (1) find reason to believe that USINPAC, and PURI, SANJAY K 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.

Attest:

April 2, 2015
Date

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 2, 2015

Michael Leahy, in official capacity as Treasurer
The Real Conservatives National Committee
5016 Spedale Ct., #232
Spring Hill, TN 37174

C00542811
AF#: 2950

Dear Mr. Leahy:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2014 through November 24, 2014, shall be filed no later than December 4, 2014. 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 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 April 1, 2015, the FEC found that there is reason to believe ("RTB") that The Real Conservatives National Committee 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 December 4, 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 \$275. 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 \$275 is due within forty (40) days of the finding, or by May 11, 2015, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$669

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

Number of Previous Civil Money Penalties Assessed: 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

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 11, 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 The Real Conservatives National Committee 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 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

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 \$275 for the 2014 Post-General Report.

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

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

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

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

The remittance and your payment are due by May 11, 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

FOR: The Real Conservatives National Committee

FEC ID#: C00542811

AF#: 2950

PAYMENT DUE DATE: May 11, 2015

PAYMENT AMOUNT DUE: \$275

**The Real Conservatives National Committee
5016 Spedale Court, #232
Spring Hill, TN 37174**

Federal Election Commission
Office of Administrative Review
999 E Street, NW
Washington, D.C. 20463

May 8, 2015

Dear Sirs:

Please consider this appeal to the \$275 fine applied to the Real Conservatives National Committee (C00542811) in AF#2950.

We are in the process of closing down this political action committee, and intend to file a notice of termination with the FEC prior to June 30 of this year.

We have no assets and no plans to conduct further activities.

Thank you for your consideration.


Michael Leahy
Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 2015

Michael Leahy, Treasurer
The Real Conservatives National Committee
5016 Spedale Ct., #232
Spring Hill, TN 37174

C00542811
AF#: 2950

Dear Mr. Leahy:

On May 17, 2015, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") for The Real Conservatives National Committee 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

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

2015 JUL -8 PM 4:19

SENSITIVE

July 8, 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: Reviewing Officer Recommendation in AF# 2950 and AF# 2993 – The Real
Conservatives National Committee and Michael Leahy, in his official capacity as
Treasurer (C00542811)

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

July 8, 2015

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

AF# 2950 and AF# 2993 – The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer (C00542811)

Summary of Recommendation

Make a final determination in AF# 2950 and AF# 2993 that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty of \$275 in both AF# 2950 and AF# 2993.

Reason-to-Believe Background

The 2014 Post-General Report was due on December 4, 2014. The Committee filed the report on March 9, 2015, 95 days late. The 2014 Year-End Report was due on January 31, 2015. The Committee filed the report on March 9, 2015, 37 days late. Both reports are not election sensitive and were filed more than 30 days after their due dates; therefore, the reports are considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On April 1 and 3, 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 file the 2014 Post-General Report and 2014 Year-End Report, respectively. The Commission also made a preliminary determination that the civil money penalty was \$275 in both AF# 2950 and AF# 2993 based on the schedule of penalties at 11 C.F.R. § 111.43. Letters dated April 2 and 6, 2015, respectively, were mailed to the respondents' address of record by the Reports Analysis Division ("RAD") to notify them of the Commission's RTB findings and civil money penalties.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee not authorized by a candidate shall file a post-general election report no later than 30 days after any general election. 52 U.S.C. § 30104(a)(4)(A)(iii) (formerly 2 U.S.C. § 434(a)(4)(A)(iii)) and 11 C.F.R. § 104.5(c)(1)(iii). In addition, the treasurer of a political committee not authorized by a candidate shall file, in an election year, a report for the period ending December 31 no later than January 31 of the following calendar year. 52 U.S.C. § 30104(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i). Reports electronically filed must be received and validated at or before 11:59 p.m. Eastern Standard/Daylight Time on the filing date 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).

Respondents' Challenges

On May 14, 2015, the Commission received the written responses ("challenges") for AF# 2950 and AF# 2993. The Treasurer explains that the Committee is in the process of winding down, has no assets, and does not plan to conduct any further activity. The Treasurer states that the Committee will request termination by June 30, 2015.

Analysis

The Reviewing Officer recognizes that the Committee is winding down and intends to request termination with the Commission.¹ However, a committee's filing obligation ends only when the committee files a termination report, and the Commission notifies them in writing that their termination report has been accepted. See 11 C.F.R. § 102.3; *Campaign Guide for Nonconnected Committees*, 93. Therefore, the respondents were required to timely file the 2014 Post-General Report and 2014 Year-End Report.

2014 Post-General Report

The Commission reminded the respondents of their requirement to file the 2014 Post-General Report prior to the filing deadline. On November 13, 2014, the Commission's Information Division sent an email to "therealcnc@gmail.com," the email address listed on the Committee's Statement of Organization. On December 1, 2014, the Commission's Electronic Filing Office ("EFO") sent an email to the same email address. Both email notifications reminded the Committee of their 2014 Post-General Report filing requirement.

The Commission also notified the Committee that it failed to file the 2014 Post-General Report. On December 5, 2014, the day after the 2014 Post-General Report was due, EFO sent an email to "therealcnc@gmail.com" notifying the Committee that it had failed to electronically file the report. On December 19, 2014, RAD sent a non-filer notification via email to "therealcnc@gmail.com."

According to RAD telecoms (written records of telephone conversations), on December 29, 2014, the Treasurer called the RAD Compliance Analyst in response to RAD's non-filer notification. The Treasurer indicated he was unaware that the Committee was required to file the 2014 Post-General Report since the Committee did not make any expenditures in connection with the General Election. The Compliance Analyst informed the Treasurer that the Committee was required to file the report, regardless of activity.

The Committee did not file the 2014 Post-General Report until March 9, 2015, 95 days after the due date and 70 days after RAD confirmed the Committee was required to file the report.²

¹ As of this date, the Committee has not filed a termination report.

² On April 7, 2015, the Committee filed an Amended 2014 Post-General Report with no change in the level of activity.

2014 Year-End Report

The Commission reminded the respondents of their requirement to file the 2014 Year-End Report prior to the filing deadline. On December 18, 2014, the Commission's Information Division sent an email to "therealcnc@gmail.com." On January 26, 2015, EFO sent an email to the same email address. Both email notifications reminded the Committee of their 2014 Year-End Report filing requirement.

The Commission also notified the Committee that it failed to file the 2014 Year-End Report. On February 1, 2015, the day after the 2014 Year-End Report was due, EFO sent an email to "therealcnc@gmail.com" notifying the Committee that it had failed to file the report. On February 20, 2015, RAD sent a non-filer notification via email to "therealcnc@gmail.com."

The Committee filed the 2014 Year-End Report on March 9, 2015, 37 days after the due date and 17 days after RAD sent the non-filer notification.³

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 meet any of the three valid grounds for challenging the RTB finding or proposed penalty at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. Therefore, the Reviewing Officer recommends that the Commission make a final determination in AF# 2950 and AF# 2993 that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess civil money penalties of \$275 in AF# 2950 and \$275 in AF# 2993.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2950 involving The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2950 that The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty of \$275;
- (3) Adopt the Reviewing Officer recommendation for AF# 2993 involving The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer, in making the final determination;
- (4) Make a final determination in AF# 2993 that The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty of \$275; and

³ On April 7, 2015, the Committee filed an Amended 2014 Year-End Report with no change in the level of activity.

(5) Send the appropriate letters.

Attachments

Attachment 1 –

Attachment 2 –

Attachment 3 – *Campaign Guide for Nonconnected Committees*, 93

Attachment 4 –

Attachment 5 –

Attachment 6 – Declaration from RAD

Attachment 7 – Declaration from OAR

CHAPTER 11

Termination and Debt Settlement

1. Committees with No Outstanding Debts

A nonconnected committee may terminate its registration and reporting obligations at any time by filing a termination report, provided that:

- The committee no longer intends to receive contributions or make expenditures;
- The committee has no outstanding debts or obligations (102.3); and
- The committee is not involved in an enforcement action (MUR), an audit or litigation with the FEC.

Termination Report

When filing a termination report, the treasurer checks the "Termination Report" box on Line 4(a) of the Summary Page of Form 3X.

The termination report must disclose:

- All receipts and disbursements not previously reported, including an accounting of debt retirement; and
- The purposes for which any remaining committee funds will be used. 102.3(a).

The committee's reporting obligation does not end until the Commission notifies the committee that the termination report has been accepted. Merely filing a termination report does not terminate the committee's reporting requirements. The Commission must accept the termination report before the committee may cease filing reports.

Disposal of Remaining Funds

A committee may use its remaining funds for any lawful purposes, including refunding them to their donors or donating them to charity. See AOs 1992-10, 1991-21, 1986-32, 1983-4 and 1979-42.

2. Committees with Outstanding Debts: Debt Settlement

Eligibility for Debt Settlement

A committee that has outstanding debts but wants to terminate may settle its debts for less than the full amount owed to the creditors. This option is available only to a terminating committee—i.e., a committee which no longer intends to support candidates and which receives contributions and makes expenditures only for the purpose of paying winding-down administrative expenses (if any) and retiring debts. 116.1(a) and 116.2(a).

An ongoing committee—i.e., a committee that does not qualify as a terminating committee—is not eligible for debt settlement and must continuously report debts until they are extinguished. 104.3(d), 116.1(b) and 116.2(b).

Debt Settlement Rules

A commercial vendor (incorporated or unincorporated) may forgive or settle debts owed by a committee without incurring a contribution if:

- Credit was initially extended in the ordinary course of business, and the terms of the credit are similar to those observed by the vendor when extending a similar amount of credit to a nonpolitical client of similar risk and size of obligation. 116.3 and 116.4(d)(1);
- The committee undertook all reasonable efforts to satisfy the outstanding debt, such as fundraising, reducing overhead costs and liquidating assets. 116.4(d)(2); and
- The vendor made the same efforts to collect the debt as those made to collect debts from a nonpolitical debtor in similar circumstances. Remedies might include, for example, late fee charges, referral to a debt collection agency or

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 The Real Conservatives National Committee:
 - A) Non-Filer Letter, dated December 19, 2014, referencing the 2014 30 Day Post-General Report (sent via electronic mail to: therealcnc@gmail.com);
 - B) Non-Filer Letter, dated February 20, 2015, referencing the 2014 Year-End Report (sent via electronic mail to: therealcnc@gmail.com);
 - C) Reason-to-Believe Letter, dated April 2, 2015 referencing the 2014 30 Day Post-General Report (sent via overnight mail to the address of record);
 - D) Reason-to-Believe Letter, dated April 6, 2015 referencing the 2014 Year-End 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 The Real Conservatives National Committee filed the 2014 30 Day Post-General Report and 2014 Year-End Report with the Commission on March 9, 2015.
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 21th day of May, 2015.

Kristin D. Roser

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

December 19, 2014

MICHAEL LEAHY, TREASURER
THE REAL CONSERVATIVES NATIONAL
COMMITTEE
5016 SPEDALE CT #232
SPRING HILL, TN 37174

IDENTIFICATION NUMBER: C00542811

REFERENCE: POST-GENERAL REPORT (10/01/2014 - 11/24/2014)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a) (formerly 2 U.S.C. §434(a))

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Marlene Colucci in the Reports Analysis Division on our toll free number (800)424-9530. The analyst's direct number is (202)694-1394.

THE REAL CONSERVATIVES NATIONAL COMMITTEE

Page 2 of 2

Sincerely,

Debbie Chacona

Deborah Chacona
Assistant Staff Director
Reports Analysis Division

250

14330069900



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

February 20, 2015

MICHAEL LEAHY, TREASURER
THE REAL CONSERVATIVES NATIONAL
COMMITTEE
5016 SPEDALE CT #232
SPRING HILL, TN 37174

IDENTIFICATION NUMBER: C00542811

REFERENCE: YEAR-END REPORT (11/25/2014 - 12/31/2014)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a) (formerly 2 U.S.C. §434(a))

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Sari Pickerall in the Reports Analysis Division on our toll free number (800)424-9530. The analyst's direct number is (202)694-1129.

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 post-general election report no later than 30 days after the general election. A political committee not authorized by a candidate which is filing on a quarterly basis shall file a report for the period ending December 31 no later than January 31 of the following calendar year. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on December 4, 2014 for the 2014 Post-General Report to be timely filed and by January 31, 2015 for the 2014 Year-End 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) Amended Statement of Organization filed by The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer. According to the Commission's records, the document was received on March 10, 2014 and lists "therealcnc@gmail.com" as the Committee's official email address.
 - b) Report Cover Page, Summary Page, and Detailed Summary Pages for the 2014 Post-General Report electronically filed by The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer. According to the Commission's records, the report covers the period from October 1 through November 24, 2014 and was received on March 9, 2015.
 - c) Report Cover Page, Summary Page, and Detailed Summary Pages for the 2014 Year-End Report electronically filed by The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer. According to the Commission's records, the report covers the period from November 25 through December 31, 2014 and was received on March 9, 2015.

- 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 8th day of July, 2015.

Rhannon Magruder

Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

FEC
FORM 1

STATEMENT OF
ORGANIZATION

RECEIVED

2013 MAR 18 AM 11:26

1. NAME OF
COMMITTEE (in full)

☐

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4MS

FEC MAIL CENTER

The Real Conservatives National Committee

ADDRESS (number and street)

5016 Spedale Ct.

☐

(Check if address
is changed)

#232

Spring Hill

CITY ▲

TN

STATE ▲

37174

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

☐

(Check if address
is changed)

therealcnc@gmail.com

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐

(Check if address
is changed)

www.therealcnc.com

2. DATE

03

18

2013

3. FEC IDENTIFICATION NUMBER ►

C

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

Michael Leahy

Signature of Treasurer

Michael Leahy

Date

03

18

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
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 06/2012)

Image# 15950849068

**FEC
FORM 3X****REPORT 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

REAL CONSERVATIVES NATIONAL COMMITTEE; THE

ADDRESS (number and street)

5016 SPEDALE CT #232

Check if different
than previously
reported. (ACC)

SPRING HILL

TN

37174

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00542811

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:☐ Feb 20 (M2)☐ May 20 (M5)☐ Aug 20 (M8)☐ Nov 20 (M11)
(Non-Election
Year Only)☐ Mar 20 (M3)☐ Jun 20 (M6)☐ Sep 20 (M9)☐ Dec 20 (M12)
(Non-Election
Year Only)☐ Apr 20 (M4)☐ Jul 20 (M7)☐ Oct 20 (M10)☐ Jan 31 (YE)(c) 12-Day
PRE-Election
Report for the:☐ Primary (12P)☐ General (12G)☐ Runoff (12R)☐ Convention (12C)☐ Special (12S)

Election on

In the
State of

(d) 30-Day

POST-Election
Report for the:☒ General (30G)☐ Runoff (30R)☐ Special (30S)

Election on

In the
State of

5. Covering Period

MM / DD / YYYY
10 / 01 / 2014

through

MM / DD / YYYY
11 / 24 / 2014

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 Michael Leahy

Signature of Treasurer

Michael Leahy

[Electronically Filed]

Date

MM / DD / YYYY
03 / 09 / 2015

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

REAL CONSERVATIVES NATIONAL COMMITTEE; THE

Report Covering the Period:

From:

10 / 01 / 2014

To:

11 / 24 / 2014

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2014		5369.88
(b) Cash on Hand at Beginning of Reporting Period.....	92.90	
(c) Total Receipts (from Line 19)	300.00	226203.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	392.90	231572.88
7. Total Disbursements (from Line 31)	369.01	231548.99
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	23.89	23.89
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)	1950.00	

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

REAL CONSERVATIVES NATIONAL COMMITTEE; THE

Report Covering the Period:

From:

M M / D D / Y Y Y Y
10 01 2014

To:

M M / D D / Y Y Y Y
11 24 2014

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	0.00	129000.00
(ii) Unitemized.....	0.00	6903.00
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	0.00	135903.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	90000.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5).....▶	0.00	225903.00
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received.....	300.00	300.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3).....	0.00	0.00
(b) Levin Funds (from Schedule H5).....	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)).....▶	300.00	226203.00
20. Total Federal Receipts (subtract Line 18(c) from Line 19).....▶	300.00	226203.00

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)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share	0.00	0.00
(b) Other Federal Operating Expenditures	0.00	231179.98
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	0.00	231179.98
22. Transfers to Affiliated/Other Party Committees	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees	0.00	0.00
24. Independent Expenditures (use Schedule E)	369.01	369.01
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)		
(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)) ..	369.01	231548.99
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)	369.01	231548.99

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Ex- penditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	0.00	225903.00
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	0.00	225903.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	0.00	231179.98
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	231179.98

Image# 15950849078

FEC FORM 3X

REPORT 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

REAL CONSERVATIVES NATIONAL COMMITTEE; THE

ADDRESS (number and street)

5016 SPEDALE CT #232

Check if different
than previously
reported. (ACC)

SPRING HILL

TN

37174

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00542811

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:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

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

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

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

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

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

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

In the
State of(d) 30-Day
POST-Election
Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

In the
State of

5. Covering Period

11

25

2014

through

12

31

2014

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 Michael Leahy

Signature of Treasurer

Michael Leahy

[Electronically Filed]

Date

03 / 09 / 2015

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
OnlyFEC FORM 3X
Rev. 12/2004

FE6AN026

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

REAL CONSERVATIVES NATIONAL COMMITTEE; THE

Report Covering the Period:

From:

M	M	/	D	D	/	Y	Y	Y	Y
1	1	/	2	5	/	2	0	1	4

To:

M	M	/	D	D	/	Y	Y	Y	Y
1	2	/	3	1	/	2	0	1	4

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2014		5369.88
(b) Cash on Hand at Beginning of Reporting Period.....	23.89	
(c) Total Receipts (from Line 19)	1750.00	227953.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	1773.89	233322.88
7. Total Disbursements (from Line 31)	1750.00	233298.99
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	23.89	23.89
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)	3700.00	

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

REAL CONSERVATIVES NATIONAL COMMITTEE; THE

Report Covering the Period:

From:

M M / D D / Y Y Y Y
11 25 2014

To:

M M / D D / Y Y Y Y
12 31 2014**I. Receipts****COLUMN A**
Total This Period**COLUMN B**
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other

Than Political Committees

(i) Itemized (use Schedule A).....

0.00

129000.00

(ii) Unitemized.....

0.00

6903.00

(iii) TOTAL (add
Lines 11(a)(i) and (ii)).....▶

0.00

135903.00

(b) Political Party Committees.....

0.00

0.00

(c) Other Political Committees
(such as PACs).....

0.00

90000.00

(d) Total Contributions (add Lines
11(a)(iii), (b), and (c)) (Carry
Totals to Line 33, page 5).....▶

0.00

225903.00

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

0.00

0.00

13. All Loans Received.....

1750.00

2050.00

14. Loan Repayments Received.....

0.00

0.00

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

0.00

0.00

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

0.00

0.00

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

0.00

0.00

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account

(from Schedule H3).....

0.00

0.00

(b) Levin Funds (from Schedule H5).....

0.00

0.00

(c) Total Transfers (add 18(a) and 18(b))..

0.00

0.00

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

1750.00

227953.00

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

1750.00

227953.00

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)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share	0.00	0.00
(b) Other Federal Operating Expenditures	0.00	231179.98
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	0.00	231179.98
22. Transfers to Affiliated/Other Party Committees	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees	0.00	0.00
24. Independent Expenditures (use Schedule E)	1750.00	2119.01
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)		
(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)) ..	1750.00	233298.99
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)	1750.00	233298.99

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Ex- penditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	0.00	225903.00
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	0.00	225903.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	0.00	231179.98
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	231179.98



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 2015

Michael Leahy, Treasurer
The Real Conservatives National Committee
5016 Spedale Ct., #232
Spring Hill, TN 37174

C00542811
AF#s: 2950 and 2993

Dear Mr. Leahy:

On April 1 and 3, 2015, the Federal Election Commission ("Commission") found reason to believe ("RTB") that The Real Conservatives National Committee 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 Post-General Report and 2014 Year-End Report, respectively. The Commission also made preliminary determinations that the civil money penalties were \$275 in AF# 2950 and \$275 in AF# 2993 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 in both cases. 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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2015 JUL 24 AM 10:49

July 24, 2015

MEMORANDUM

SENSITIVE

To: The Commission

Through: Alec Palmer *WHP for*
Staff Director

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

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2950 and AF# 2993 – The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer (C00542811)

On April 1 and 3, 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 file the 2014 Post-General Report and 2014 Year-End Report, respectively. The Commission also made a preliminary determination that the civil money penalty was \$275 in both AF# 2950 and AF# 2993 based on the schedule of penalties at 11 C.F.R. § 111.43.

On May 14, 2015, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated July 8, 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 in AF# 2950 and AF# 2993 that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess civil money penalties of \$275 in AF# 2950 and \$275 in AF# 2993.

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). As of this date, a written response has not been received.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 2950 involving The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 2950 that The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty of \$275;
- (3) Adopt the Reviewing Officer recommendation for AF# 2993 involving The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer, in making the final determination;
- (4) Make a final determination in AF# 2993 that The Real Conservatives National Committee and Michael Leahy, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty of \$275; and
- (5) Send the appropriate letters.

2025 RELEASE UNDER E.O. 14176

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AFs 2950 and 2993
Final Determination Recommendation:)
The Real Conservatives National)
Committee and Michael Leahy, in his)
official capacity as Treasurer)
(C00542811))

CERTIFICATION

I, Shawn Woodhead Werth, recording secretary for the Federal Election Commission executive session on September 15, 2015, do hereby certify that the Commission decided by a vote of 5-1 to otherwise terminate the proceedings pursuant to 11 C.F.R. § 111.37(b).

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

Attest:

September 16, 2015
Date

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 16, 2015

Michael Leahy, Treasurer
The Real Conservatives National Committee
5016 Spedale Ct., #232
Spring Hill, TN 37174

C00542811
AF#: 2950/2993

Dear Mr. Leahy:

On April 1 and 3, 2015, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that The Real Conservatives National Committee 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 Post-General Report and 2014 Year-End Report, respectively. By letters dated April 2 and 6, 2015, respectively, the Commission sent notification of the RTB findings that included a civil money penalty calculated at RTB of \$275 in both AF# 2950 and AF# 2993, in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On May 14, 2015, the Office of Administrative Review received your written response challenging the RTB findings.

The Reviewing Officer reviewed the Commission's RTB findings with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that The Real Conservatives National Committee 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 \$275 in both AF# 2950 and AF# 2993, in accordance with 11 C.F.R. § 111.43. A copy of the Reviewing Officer Recommendation was sent to you on July 8, 2015.

On September 15, 2015, the Commission failed to adopt the Reviewing Officer's recommendation, and voted to terminate the proceedings with respect to 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) in AF# 2950 and AF# 2993 and close the files. A copy of the Final Determination Recommendation is attached.

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

If you have any questions regarding these matters, 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,

A handwritten signature in black ink, appearing to read "Ann M. Ravel". The signature is fluid and cursive, with the first name "Ann" and the last name "Ravel" being the most prominent parts.

Ann M. Ravel
Chair

UNNENNENNN



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2950

DATE SCANNED 10/18/15

SCANNER NO. 2

SCAN OPERATOR Jhy

150627072474