

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #3587



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECTION 101

2019 MAR 12 PM 3:06

SENSITIVE

March 12, 2019

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP by MAH*
Staff Director

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

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: *KDR* *BH*
Kristin D. Roser/Ben Holly
Reports Analysis Division
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2018 12 Day Pre-General Report
(Unauthorized Committees – 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 2018 12 Day Pre-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2018 through October 17, 2018, and failed to file or timely file the 2018 12 Day Pre-General Report.

The committees listed on the attached RTB Circulation Report failed to file the report prior to four (4) days before the General Election (considered a non-filed report). In accordance with the schedule of civil money penalties at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

As noted above, the 2018 12 Day Pre-General Report circulation list includes unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2018 through October 17, 2018, but failed to file or timely file the 2018 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, 2018 through November 26, 2018 (57 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 29.82% (17 days (12G Filing Period)/57 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.
- Every Year-End Report (YE) submitted by an unauthorized quarterly filer that covered the period from October 1, 2018 through December 31, 2018 (92 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 18.48% (17 days (12G Filing Period)/92 days (YE 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, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(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.

3/12/2019 12:00 PM

Federal Election Commission
Reason to Believe Circulation Report
2018 PRE-GENERAL Election Sensitive 10/25/2018 UNAUTH_Q

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3576	C00426445	ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC)		DANIEL J. SUTHERBY	\$191,484	0	12/8/2018	Not Filed	\$12,000	\$1,230
3577	C00314054	AMERICAN AIR LIQUIDE HOLDINGS INC PAC		TAMARA SARONT-EISNER	\$119,585	0	12/7/2018	Not Filed	\$1,651	\$684
3578	C00153171	AMERICAN BENEFITS COUNCIL POLITICAL ACTION COMMITTEE		RALPH P. KASS	\$106,100	0	12/3/2018	Not Filed	\$5,500	\$820
3579	C00197715	AMERICAN PISTACHIO GROWERS PISTACHIO POLITICAL ACTION COMMITTEE		ROBERT LAKE	\$366,498	0	12/6/2018	Not Filed	\$12,700	\$1,230
3580	C00410126	AMERICANS FOR THE ARTS ACTION FUND PAC		NINA OZLU TUNCELI	\$196,660	0	12/6/2018	Not Filed	\$14,825	\$1,230
3581	C00409789	BLESSEY MARINE SERVICE, INC. POLITICAL ACTION COMMITTEE		PATRICK VOSS	\$158,773	0	12/3/2018	Not Filed	\$3,814	\$684
3582	C00415752	BORDER HEALTH FEDERAL PAC		ERNIE PEREZ	\$1,501,911	0	1/31/2019	Not Filed	\$27,153	\$1,913
3583	C00382275	BUTLER SNOW POLITICAL ACTION COMMITTEE		TOMMIE CARDIN	\$576,613	0	11/27/2018	Not Filed	\$21,800	\$1,230
3584	C00541110	CANAL BARGE COMPANY INC PAC (CANAL BARGE PAC)		WILLIAM S. MURPHY	\$103,925	0	11/30/2018	Not Filed	\$2,432	\$684
3585	C00341990	CAROLYN'S PAC		MELISSA A. MENDEZ	\$574,468	0	12/28/2018	Not Filed	\$28,800	\$1,913
3586	C00685693	CASA IN ACTION PAC		MELISSA GUZMAN	\$432,387	0	1/3/2019	Not Filed	\$14,865	\$1,230
3587	C00658302	CLUB FOR CONSERVATIVES		BROOKE PENDLEY	\$470,369	0	12/6/2018	Not Filed	\$6,403	\$820
3588	C00450866	CONCORDIA POLITICAL ACTION COMMITTEE, INC.		DANIEL T. KING	\$118,150	0	12/11/2018	Not Filed	\$5,001	\$820
3589	C00409458	CONSERVATIVE OPPORTUNITIES FOR A NEW AMERICA PAC		WILLIAM R. BAIN	\$1,099,188	0	12/7/2018	Not Filed	\$84,164	\$5,813
3590	C00034827	EATON CORPORATION PUBLIC POLICY ASSOCIATION		DAVID A. JOHNSON	\$130,290	0	12/6/2018	Not Filed	\$5,168	\$820

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3591	C00453704	EMGAGE FEDERAL POLITICAL ACTION COMMITTEE		AMIN MITHA	\$218,449	0	12/6/2018	Not Filed	\$3,967	\$684
3592	C00333666	JEWELERS OF AMERICA, INC. POLITICAL ACTION COMMITTEE (JAPAC)		DAVID J. BONAPARTE	\$105,595	0	12/6/2018	Not Filed	\$11,544	\$1,230
3593	C00432096	KEYSTONE ALLIANCE POLITICAL ACTION COMMITTEE		ROBERT B. ASHER	\$444,574	1	1/9/2019	Not Filed	\$21,691	\$1,537
3594	C00244400	LIVESTOCK MARKETING ASSOCIATION POLITICAL ACTION COMMITTEE (LMA-PAC)		CHELSEA KAY GOOD	\$243,962	0	12/3/2018	Not Filed	\$2,000	\$684
3595	C00652529	LOCKTON INC POLITICAL ACTION COMMITTEE		HENRY BOND	\$296,190	0	12/6/2018	Not Filed	\$7,301	\$820
3596	C00565630	MAINTAINING ALL REPUBLICANS IN OFFICE PAC		ROSEMARY CANALS	\$220,105	0	12/7/2018	Not Filed	\$19,400	\$1,230
3597	C00208322	MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE		LYLE J. PARRY	\$295,017	0	12/6/2018	Not Filed	\$34,000	\$1,913
3598	C00272724	MAYNARD COOPER & GALE PC PAC		DANIEL M. WILSON	\$223,298	0	11/28/2018	Not Filed	\$4,887	\$684
3599	C00140061	NATIONAL EMERGENCY MEDICINE POLITICAL ACTION COMMITTEE / AMERICAN COLLEGE OF EMERGENCY PHYSICIANS		LAYLA POWERS	\$3,889,888	0	12/4/2018	Not Filed	\$180,409	\$8,719
3600	C00163311	NATIONAL STAR ROUTE MAIL CONTRACTORS ASSOCIATION POLITICAL ACTION COMMITTEE		JOHN V. MARANEY	\$122,210	0	1/31/2019	Not Filed	\$579	\$579
3601	C00076182	NATIONAL TURKEY FEDERATION POLITICAL ACTION COMMITTEE/TURPAC		JOEL BRANDENBERGER	\$816,389	0	12/17/2018	Not Filed	\$8,000	\$820
3602	C00634964	NEW NATION RISING		OLUFEMI OGUNNAIKE	\$1,512,947	0	11/2/2018	Not Filed	\$494,090	\$15,987
3603	C00216754	NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC		PHILLIP JACOB PARKER JR.	\$163,074	0	11/30/2018	Not Filed	\$8,393	\$820
3604	C00562546	NOVOCURE INC. PAC		TODD LONGSWORTH	\$128,905	0	12/6/2018	Not Filed	\$5,055	\$820

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3605	C00210617	OHIOHEALTH STAR CORPORATION POLITICAL ACTION COMMITTEE DBA OHIOHEALTH PAC		KAREN J. MORRISON	\$171,452	0	12/4/2018	Not Filed	\$11,608	\$1,230
3606	C00206177	PIPEFITTERS LOCAL UNION #533 VOLUNTEER POLITICAL FUND		SCOTT FORBES	\$1,030,149	0	12/12/2018	Not Filed	\$39,467	\$1,913
3607	C00134742	PLASTERERS' AND CEMENT MASONS' ACTION COMMITTEE		KEVIN SEXTON	\$131,489	0	12/4/2018	Not Filed	\$12,940	\$1,230
3608	C00536466	RENEWABLE ENERGY GROUP INC POLITICAL ACTION COMMITTEE (REG PAC)		ANTHONY HULEN	\$174,108	0	12/6/2018	Not Filed	\$17,442	\$1,230
3609	C00246736	SEABOARD CORPORATION POLITICAL ACTION COMMITTEE		DAVID DANNOV	\$145,112	0	12/4/2018	Not Filed	\$4,731	\$684
3610	C00118919	SNACK FOOD ASSOCIATION POLITICAL ACTION COMMITTEE (SNACKPAC)		JESSICA HIXSON	\$120,034	0	12/7/2018	Not Filed	\$1,209	\$684
3611	C00300426	SOUTHEAST COTTON COMMITTEE (SECC) SOUTHERN COTTONGROWERS INC/SE COTTON GINNERS ASSN SUPPORTING		DAVID RUPPENICKER	\$365,812	0	1/28/2019	Not Filed	\$2,500	\$684
3612	C00453324	CONSERVATIVES OF TODAY AND TOMORROW (SCOTT PAC)		STEVEN JOSEPH YSAIS	\$127,837	0	12/6/2018	Not Filed	\$8,295	\$820
3613	C00279828	TEXTILE RENTAL SERVICES ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (TRSAPAC)		THOMAS NEWELL	\$484,090	0	12/4/2018	Not Filed	\$135,000	\$7,267
3614	C00387720	U.S.-CUBA DEMOCRACY POLITICAL ACTION COMMITTEE		GUS MACHADO	\$443,887	0	12/6/2018	Not Filed	\$2,188	\$684
3615	C00150045	UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG CARPENTERS LEGIS EMP CMTE		STEPHEN JOYCE	\$180,912	0	12/5/2018	Not Filed	\$15,000	\$1,230
3616	C00489203	UNITED MINE WORKERS OF AMERICA POWER PAC		LEVI ALLEN	\$876,604	0	12/5/2018	Not Filed	\$157,946	\$8,719

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3617	C00193979	WESTERN GROWERS POLITICAL ACTION COMMITTEE		WARD KENNEDY	\$173,828	0	12/6/2018	Not Filed	\$2,800	\$684

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3587
 Reason To Believe Recommendation -)
 2018 12 Day Pre-General Report)
 (Unauthorized Committees - Quarterly)
 Filers): Club for Conservatives and)
 Brooke Pendley in her official capacity)
 as treasurer)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 14, 2019, the Commission decided by a vote of 4-0 to take the following actions in AF 3587:

1. Find reason to believe that Club for Conservatives and Brooke Pendley in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that a civil money penalty of \$820 be assessed.
2. Send the appropriate letter.

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

Attest:

March 15, 2019
 Date

Dayna C. Brown
 Dayna C. Brown
 Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 15, 2019

Brooke Pendley, in official capacity as Treasurer
Club for Conservatives
435 Merchant Walk Square, Suite 300 #516
Charlottesville, VA 22902

C00658302
AF#: 3587

Dear Ms. Pendley:

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, 2018 through October 17, 2018, shall be filed no later than October 25, 2018. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report prior to four (4) days before the General Election held on November 6, 2018, the report is considered not filed for the purpose of calculating the civil money penalty. 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). 52 U.S.C. § 30109(a)(4). On March 14, 2019, the FEC found that there is reason to believe ("RTB") that Club for Conservatives and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before October 25, 2018. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$820. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <https://www.fec.gov/af/pay.shtml> 11 C.F.R. § 111.34. Your payment of \$820 is due within forty (40) days of the finding, or by April 23, 2019, and is based on these factors:

Election Sensitivity of Report: Election Sensitive

Level of Activity: \$6,403

Number of Days Late: Not Filed (reports not filed prior to four (4) days before the General Election held on November 6, 2018 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, 1050 First Street, NE, Washington, DC 20002. 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 April 23, 2019. 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. 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 Club for Conservatives and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(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, follow the payment instructions on page 4 of this letter. 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.

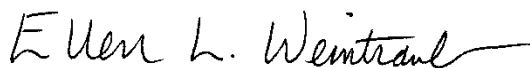
5. Settlement Offers

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). 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) and 30109(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 <https://www.fec.gov/af/pay.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly 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. 1158) or (202) 694-1158.

On behalf of the Commission,



Ellen L. Weintraub
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 \$820 for the 2018 Pre-General Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

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

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

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

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

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: Club for Conservatives

FEC ID#: C00658302

AF#: 3587

PAYMENT DUE DATE: April 23, 2019

PAYMENT AMOUNT DUE: \$820



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED

By Office of the Commission Secretary at 9:26 am, Jun 08, 2020

SENSITIVE

June 5, 2020

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

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

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: *KDR* Kristin D. Roser/Ben Holly *BH*
Reports Analysis Division
Compliance Branch

SUBJECT: Withdrawal and Resubmission of Final Determination Recommendation – 2018 12 Day Pre-General Report (Unauthorized Committees – Quarterly Filers) for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on October 21, 2019 in order to reflect updates disclosed in filings received by the Commission after the initial submission of this recommendation. The document was updated to reflect a change in the Treasurer for Management and Training Corporation Political Action Committee (AF 3597).

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2018 12 Day Pre-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

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

For your information, one (1) committee disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of this case has been provided below.

Lockton Inc. Political Action Committee (AF 3595) filed the 2018 12 Day Pre-General Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$1,301 (previously estimated to be \$7,301), thus the fine would be lowered from \$820 to \$684.

For your information, three (3) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

Management and Training Corporation Political Action Committee (AF 3597) filed an Amended Statement of Organization after the RTB finding designating Daniel Marquardt as Treasurer.

Pipefitters Local #533 Volunteer Political Fund (AF 3606) filed an Amended Statement of Organization after the RTB finding designating Charles Roseburrough as Treasurer.

Western Growers Political Action Committee (AF 3617) filed an Amended Statement of Organization after the RTB finding designating Ashlee Titus as Treasurer.

RAD Recommendation

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

Federal Election Commission
FD Circulation Report Fine Paid
2018 PRE-GENERAL Election Sensitive 10/25/2018 UNAUTH_Q

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
3576	ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC)		C00426445	DANIEL J. SUTHERBY	12/08/2018	Not Filed	\$12,000	0	03/14/2019	\$1,230	\$1,230	04/09/2019	\$1,230
3577	AMERICAN AIR LIQUIDE HOLDINGS INC PAC		C00314054	TAMARA SARONT-EISNER	12/07/2018	Not Filed	\$1,000	0	03/14/2019	\$684	\$684	04/22/2019	\$684
3578	AMERICAN BENEFITS COUNCIL POLITICAL ACTION COMMITTEE		C00153171	RALPH P. KASS	12/03/2018	Not Filed	\$5,500	0	03/14/2019	\$820	\$820	04/22/2019	\$820
3579	AMERICAN PISTACHIO GROWERS PISTACHIO POLITICAL ACTION COMMITTEE		C00197715	ROBERT LAKE	12/06/2018	Not Filed	\$12,700	0	03/14/2019	\$1,230	\$1,230	03/29/2019	\$1,230
3580	AMERICANS FOR THE ARTS ACTION FUND PAC		C00410126	NINA OZLU TUNCELI	12/06/2018	Not Filed	\$14,825	0	03/14/2019	\$1,230	\$1,230	04/24/2019	\$1,230
3583	BUTLER SNOW POLITICAL ACTION COMMITTEE		C00382275	TOMMIE CARDIN	11/27/2018	Not Filed	\$21,800	0	03/14/2019	\$1,230	\$1,230	04/16/2019	\$1,230
3584	CANAL BARGE COMPANY INC PAC (CANAL BARGE PAC)		C00541110	WILLIAM S. MURPHY	11/30/2018	Not Filed	\$3,452	0	03/14/2019	\$684	\$684	04/19/2019	\$684
3585	CAROLYN'S PAC		C00341990	MELISSA A. MENDEZ	12/28/2018	Not Filed	\$28,800	0	03/14/2019	\$1,913	\$1,913	04/19/2019	\$1,913
3586	CASA IN ACTION PAC		C00685693	MELISSA GUZMAN	01/03/2019	Not Filed	\$64,865	0	03/14/2019	\$1,230	\$1,230	04/03/2019	\$1,230
3589	CONSERVATIVE OPPORTUNITIES FOR A NEW AMERICA PAC		C00409458	WILLIAM R. BAIN	12/07/2018	Not Filed	\$84,164	0	03/14/2019	\$5,813	\$5,813	04/18/2019	\$5,813
3590	EATON CORPORATION PUBLIC POLICY ASSOCIATION		C00034827	DAVID A. JOHNSON	12/06/2018	Not Filed	\$5,186	0	03/14/2019	\$820	\$820	05/06/2019	\$820
3591	EMGAGE FEDERAL POLITICAL ACTION COMMITTEE		C00453704	AMIN MITHA	12/06/2018	Not Filed	\$3,900	0	03/14/2019	\$684	\$684	03/29/2019	\$684
3592	JEWELERS OF AMERICA, INC. POLITICAL ACTION COMMITTEE (JAPAC)		C00333666	DAVID J. BONAPARTE	12/06/2018	Not Filed	\$11,650	0	03/14/2019	\$1,230	\$1,230	04/19/2019	\$1,230
3593	KEYSTONE ALLIANCE POLITICAL ACTION COMMITTEE		C00432096	ROBERT ASHER	01/09/2019	Not Filed	\$21,691	1	03/14/2019	\$1,537	\$1,537	04/24/2019	\$1,537
3594	LIVESTOCK MARKETING ASSOCIATION POLITICAL ACTION COMMITTEE (LMA-PAC)		C00244400	CHELSEA KAY GOOD	12/03/2018	Not Filed	\$2,000	0	03/14/2019	\$684	\$684	03/27/2019	\$684
3596	MAINTAINING ALL REPUBLICANS IN OFFICE PAC		C00565630	ROSEMARY CANALS	12/07/2018	Not Filed	\$19,400	0	03/14/2019	\$1,230	\$1,230	04/15/2019	\$1,230
3597	MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE		C00208322	DANIEL B. MARQUARDT	12/06/2018	Not Filed	\$34,000	0	03/14/2019	\$1,913	\$1,913	03/21/2019	\$1,913

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
3599	NATIONAL EMERGENCY MEDICINE POLITICAL ACTION COMMITTEE / AMERICAN COLLEGE OF EMERGENCY PHYSICIANS		C00140061	LAYLA POWERS	12/04/2018	Not Filed	\$180,409	0	03/14/2019	\$8,719	\$8,719	03/26/2019	\$8,719
3600	NATIONAL STAR ROUTE MAIL CONTRACTORS ASSOCIATION POLITICAL ACTION COMMITTEE		C00163311	JOHN V. MARANEY	01/31/2019	Not Filed	\$900	0	03/14/2019	\$579	\$579	04/05/2019	\$579
3601	NATIONAL TURKEY FEDERATION POLITICAL ACTION COMMITTEE/TURPAC		C00076182	JOEL BRANDENBERGER	12/17/2018	Not Filed	\$8,000	0	03/14/2019	\$820	\$820	04/02/2019	\$820
3603	NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARM PAC		C00216754	PHILLIP JACOB PARKER JR.	11/30/2018	Not Filed	\$15,175	0	03/14/2019	\$820	\$820	04/08/2019	\$820
3604	NOVOCURE INC. PAC		C00562546	TODD LONGSWORTH	12/06/2018	Not Filed	\$5,000	0	03/14/2019	\$820	\$820	04/10/2019	\$820
3605	OHIOHEALTH STAR CORPORATION POLITICAL ACTION COMMITTEE DBA OHIOHEALTH PAC		C00210617	KAREN J. MORRISON	12/04/2018	Not Filed	\$11,834	0	03/14/2019	\$1,230	\$1,230	03/27/2019	\$1,230
3607	PLASTERERS' AND CEMENT MASONS' ACTION COMMITTEE		C00134742	KEVIN SEXTON	12/04/2018	Not Filed	\$12,940	0	03/14/2019	\$1,230	\$1,230	03/26/2019	\$1,230
3608	RENEWABLE ENERGY GROUP INC POLITICAL ACTION COMMITTEE (REG PAC)		C00536466	ANTHONY HULEN	12/06/2018	Not Filed	\$17,442	0	03/14/2019	\$1,230	\$1,230	04/15/2019	\$1,230
3609	SEABOARD CORPORATION POLITICAL ACTION COMMITTEE		C00246736	DAVID DANNOV	12/04/2018	Not Filed	\$4,731	0	03/14/2019	\$684	\$684	04/02/2019	\$684
3610	SNACK FOOD ASSOCIATION POLITICAL ACTION COMMITTEE (SNACKPAC)		C00118919	JESSICA HIXSON	12/07/2018	Not Filed	\$1,209	0	03/14/2019	\$684	\$684	04/29/2019	\$684
3611	SOUTHEAST COTTON COMMITTEE (SECC) SOUTHERN COTTONGROWERS INC/SE COTTON GINNERS ASSN		C00300426	DAVID RUPPENICKER	01/28/2019	Not Filed	\$2,500	0	03/14/2019	\$684	\$684	03/22/2019	\$684
3612	SUPPORTING CONSERVATIVES OF TODAY AND TOMORROW (SCOTT PAC)		C00453324	STEVEN JOSEPH YSAIS	12/06/2018	Not Filed	\$8,295	0	03/14/2019	\$820	\$820	04/10/2019	\$820
3613	TEXTILE RENTAL SERVICES ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (TRSAPAC)		C00279828	THOMAS NEWELL	12/04/2018	Not Filed	\$135,000	0	03/14/2019	\$7,267	\$7,267	04/05/2019	\$7,267
3614	U.S.-CUBA DEMOCRACY POLITICAL ACTION COMMITTEE		C00387720	GUS MACHADO	12/06/2018	Not Filed	\$2,348	0	03/14/2019	\$684	\$684	04/08/2019	\$684

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
3615	UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG CARPENTERS LEGIS EMP CMTE		C00150045	STEPHEN JOYCE	12/05/2018	Not Filed	\$15,000	0	03/14/2019	\$1,230	\$1,230	04/01/2019	\$1,230
3616	UNITED MINE WORKERS OF AMERICA POWER PAC		C00489203	LEVI ALLEN	12/05/2018	Not Filed	\$157,937	0	03/14/2019	\$8,719	\$8,719	04/02/2019	\$8,719
3617	WESTERN GROWERS POLITICAL ACTION COMMITTEE		C00193979	ASHLEE N. TITUS	12/06/2018	Not Filed	\$2,800	0	03/14/2019	\$684	\$684	04/02/2019	\$684

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FD Circulation Report Fine Not Paid
2018 PRE-GENERAL Election Sensitive 10/25/2018 UNAUTH_Q

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
3581	BLESSEY MARINE SERVICE, INC. POLITICAL ACTION COMMITTEE		C00409789	PATRICK VOSS	12/03/2018	Not Filed	\$3,500	0	03/14/2019	\$684	449	\$684
3582	BORDER HEALTH FEDERAL PAC		C00415752	ERNIE PEREZ	01/31/2019	Not Filed	\$27,153	0	03/14/2019	\$1,913	449	\$1,913
3587	CLUB FOR CONSERVATIVES		C00658302	BROOKE PENDLEY	12/06/2018	Not Filed	\$6,403	0	03/14/2019	\$820	449	\$820
3595	LOCKTON INC POLITICAL ACTION COMMITTEE		C00652529	HENRY BOND	12/06/2018	Not Filed	\$1,301	0	03/14/2019	\$820	449	\$684
3602	NEW NATION RISING		C00634964	OLUFEMI OGUNNAIKE	11/02/2018	Not Filed	\$494,090	0	03/14/2019	\$15,987	449	\$15,987
3606	PIPEFITTERS LOCAL #533 VOLUNTEER POLITICAL FUND		C00206177	CHARLES J. ROSEBURROUGH	12/12/2018	Not Filed	\$35,000	0	03/14/2019	\$1,913	449	\$1,913

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Withdrawal and Resubmission of Final	)	
Determination Recommendation – 2018 12	)	
Day Pre-General Report (Unauthorized	)	
Committees – Quarterly Filers) for the	)	
Administrative Fine Program:	)	
ABIOMED INC POLITICAL ACTION	)	AF# 3576
COMMITTEE (ABIOMED PAC), and	)	
SUTHERBY, DANIEL J. as treasurer;	)	
AMERICAN AIR LIQUIDE HOLDINGS	)	AF# 3577
INC PAC, and SARONT-EISNER,	)	
TAMARA as treasurer;	)	
AMERICAN BENEFITS COUNCIL	)	AF# 3578
POLITICAL ACTION COMMITTEE, and	)	
KASS, RALPH P. as treasurer;	)	
AMERICAN PISTACHIO GROWERS	)	AF# 3579
PISTACHIO POLITICAL ACTION	)	
COMMITTEE, and LAKE, ROBERT as	)	
treasurer;	)	
AMERICANS FOR THE ARTS ACTION	)	AF# 3580
FUND PAC, and OZLU TUNCELI, NINA	)	
as treasurer;	)	
BLESSEY MARINE SERVICE, INC.	)	AF# 3581
POLITICAL ACTION COMMITTEE, and	)	
VOSS, PATRICK as treasurer;	)	
BORDER HEALTH FEDERAL PAC, and	)	AF# 3582
ERNIE PEREZ as treasurer;	)	
BUTLER SNOW POLITICAL ACTION	)	AF# 3583
COMMITTEE, and CARDIN, TOMMIE	)	
MR. as treasurer;	)	
CANAL BARGE COMPANY INC PAC	)	AF# 3584
(CANAL BARGE PAC), and WILLIAM S	)	
MURPHY as treasurer;	)	
CAROLYN'S PAC, and MENDEZ,	)	AF# 3585
MELISSA A. MS as treasurer;	)	
CASA IN ACTION PAC, and GUZMAN,	)	AF# 3586
MELISSA as treasurer;	)	

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CLUB FOR CONSERVATIVES, and	)	AF# 3587
PENDLEY, BROOKE as treasurer;	)	
CONSERVATIVE OPPORTUNITIES FOR	)	AF# 3589
A NEW AMERICA PAC, and BAIN,	)	
WILLIAM R. MR. as treasurer;	)	
EATON CORPORATION PUBLIC	)	AF# 3590
POLICY ASSOCIATION, and JOHNSON,	)	
DAVID A. as treasurer;	)	
EMGAGE FEDERAL POLITICAL	)	AF# 3591
ACTION COMMITTEE, and MITHA,	)	
AMIN as treasurer;	)	
JEWELERS OF AMERICA, INC.	)	AF# 3592
POLITICAL ACTION COMMITTEE	)	
(JAPAC), and DAVID J. BONAPARTE as	)	
treasurer;	)	
KEYSTONE ALLIANCE POLITICAL	)	AF# 3593
ACTION COMMITTEE, and ASHER,	)	
ROBERT as treasurer;	)	
LIVESTOCK MARKETING	)	AF# 3594
ASSOCIATION POLITICAL ACTION	)	
COMMITTEE (LMA-PAC), and GOOD,	)	
CHELSEA KAY as treasurer;	)	
LOCKTON INC POLITICAL ACTION	)	AF# 3595
COMMITTEE, and BOND, HENRY as	)	
treasurer;	)	
MAINTAINING ALL REPUBLICANS IN	)	AF# 3596
OFFICE PAC, and ROSEMARY CANALS	)	
as treasurer;	)	
MANAGEMENT AND TRAINING	)	AF# 3597
CORPORATION POLITICAL ACTION	)	
COMMITTEE, and MARQUARDT,	)	
DANIEL B as treasurer;	)	
NATIONAL EMERGENCY MEDICINE	)	AF# 3599
POLITICAL ACTION COMMITTEE /	)	
AMERICAN COLLEGE OF	)	
EMERGENCY PHYSICIANS, and	)	
POWERS, LAYLA MRS. MBA as	)	
treasurer;	)	

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NATIONAL STAR ROUTE MAIL	)	AF# 3600
CONTRACTORS ASSOCIATION	)	
POLITICAL ACTION COMMITTEE, and	)	
MARANNEY, JOHN V. as treasurer;	)	
NATIONAL TURKEY FEDERATION		AF# 3601
POLITICAL ACTION		
COMMITTEE/TURPAC, and		
BRANDENBERGER, JOEL as treasurer;		
NEW NATION RISING, and	)	AF# 3602
OGUNNAIKE, OLUFEMI as treasurer;	)	
NORTH CAROLINA FARM BUREAU	)	AF# 3603
FEDERATION INC POL ACT CMTE INC	)	
(AKA) NC FARM BUREAU FARMPAC,	)	
and PARKER, PHILLIP JACOB JR. as	)	
treasurer;	)	
NOVOCURE INC. PAC, and	)	AF# 3604
LONGSWORTH, TODD as treasurer;	)	
OHIOHEALTH STAR CORPORATION	)	AF# 3605
POLITICAL ACTION COMMITTEE DBA	)	
OHIOHEALTH PAC, and MORRISON,	)	
KAREN J as treasurer;	)	
PIPEFITTERS LOCAL #533	)	AF# 3606
VOLUNTEER POLITICAL FUND, and	)	
ROSEBURROUGH, CHARLES J as	)	
treasurer;	)	
PLASTERERS' AND CEMENT MASONS'	)	AF# 3607
ACTION COMMITTEE, and SEXTON,	)	
KEVIN as treasurer;	)	
RENEWABLE ENERGY GROUP INC	)	AF# 3608
POLITICAL ACTION COMMITTEE	)	
(REG PAC), and HULEN, ANTHONY as	)	
treasurer;	)	
SEABOARD CORPORATION	)	AF# 3609
POLITICAL ACTION COMMITTEE, and	)	
DANNOV, DAVID as treasurer;	)	
SNACK FOOD ASSOCIATION	)	AF# 3610
POLITICAL ACTION COMMITTEE	)	
(SNACKPAC), and HIXSON, JESSICA as	)	
treasurer;	)	

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SOUTHEAST COTTON COMMITTEE	)	AF# 3611
(SECC) SOUTHERN	)	
COTTONGROWERS INC/SE COTTON	)	
GINNERS ASSN, and RUPPENICKER,	)	
DAVID as treasurer;	)	
SUPPORTING CONSERVATIVES OF	)	AF# 3612
TODAY AND TOMORROW (SCOTT	)	
PAC), and YSAIS, STEVEN JOSEPH as	)	
treasurer;	)	
TEXTILE RENTAL SERVICES	)	AF# 3613
ASSOCIATION OF AMERICA	)	
POLITICAL ACTION COMMITTEE	)	
(TRSAPAC), and THOMAS NEWELL as	)	
treasurer;	)	
U.S.-CUBA DEMOCRACY POLITICAL	)	AF# 3614
ACTION COMMITTEE, and MACHADO,	)	
GUS MR. as treasurer;	)	
UNITED BROTHERHOOD OF	)	AF# 3615
CARPENTERS/JOINERS OF AMER	)	
NEW ENGLAND REG CARPENTERS	)	
LEGIS EMP CMTE, and STEPHEN,	)	
JOYCE as treasurer;	)	
UNITED MINE WORKERS OF	)	AF# 3616
AMERICA POWER PAC, and ALLEN,	)	
LEVI as treasurer;	)	
WESTERN GROWERS POLITICAL	)	AF# 3617
ACTION COMMITTEE, and TITUS,	)	
ASHLEE N. as treasurer;	)	

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CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 29, 2020 the Commission took the following actions on the Withdrawal and Resubmission of Final Determination Recommendation – 2018 12 Day Pre-General Report (Unauthorized Committees – Quarterly Filers) for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated June 05, 2020, on the following committees:

AF#3576 Decided by a vote of 4-0 to: (1) make a final determination that ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC), and SUTHERBY, DANIEL J. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3577 Decided by a vote of 4-0 to: (1) make a final determination that AMERICAN AIR LIQUIDE HOLDINGS INC PAC, and SARONT-EISNER, TAMARA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3578 Decided by a vote of 4-0 to: (1) make a final determination that AMERICAN BENEFITS COUNCIL POLITICAL ACTION COMMITTEE, and KASS, RALPH P. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3579 Decided by a vote of 4-0 to: (1) make a final determination that AMERICAN PISTACHIO GROWERS PISTACHIO POLITICAL ACTION COMMITTEE, and LAKE, ROBERT in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the

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appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3580 Decided by a vote of 4-0 to: (1) make a final determination that AMERICANS FOR THE ARTS ACTION FUND PAC, and OZLU TUNCELI, NINA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3581 Decided by a vote of 4-0 to: (1) make a final determination that BLESSEY MARINE SERVICE, INC. POLITICAL ACTION COMMITTEE, and VOSS, PATRICK in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3582 Decided by a vote of 4-0 to: (1) make a final determination that BORDER HEALTH FEDERAL PAC, and ERNIE PEREZ in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3583 Decided by a vote of 4-0 to: (1) make a final determination that BUTLER SNOW POLITICAL ACTION COMMITTEE, and CARDIN, TOMMIE MR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3584 Decided by a vote of 4-0 to: (1) make a final determination that CANAL BARGE COMPANY INC PAC (CANAL BARGE PAC), and WILLIAM S MURPHY in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3585 Decided by a vote of 4-0 to: (1) make a final determination that CAROLYN'S PAC, and MENDEZ, MELISSA A. MS in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3586 Decided by a vote of 4-0 to: (1) make a final determination that CASA IN ACTION PAC, and GUZMAN, MELISSA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3587 Decided by a vote of 4-0 to: (1) make a final determination that CLUB FOR CONSERVATIVES, and PENDLEY, BROOKE in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3589 Decided by a vote of 4-0 to: (1) make a final determination that CONSERVATIVE OPPORTUNITIES FOR A NEW AMERICA PAC, and BAIN, WILLIAM R. MR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3590 Decided by a vote of 4-0 to: (1) make a final determination that EATON CORPORATION PUBLIC POLICY ASSOCIATION, and JOHNSON, DAVID A. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3591 Decided by a vote of 4-0 to: (1) make a final determination that EMGAGE FEDERAL POLITICAL ACTION COMMITTEE, and MITHA, AMIN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3592 Decided by a vote of 4-0 to: (1) make a final determination that JEWELERS OF AMERICA, INC. POLITICAL ACTION COMMITTEE (JAPAC), and DAVID J. BONAPARTE in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3593 Decided by a vote of 4-0 to: (1) make a final determination that KEYSTONE ALLIANCE POLITICAL ACTION COMMITTEE, and ASHER, ROBERT in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3594 Decided by a vote of 4-0 to: (1) make a final determination that LIVESTOCK MARKETING ASSOCIATION POLITICAL ACTION COMMITTEE (LMA-PAC), and GOOD, CHELSEA KAY in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3595 Decided by a vote of 4-0 to: (1) make a final determination that LOCKTON INC POLITICAL ACTION COMMITTEE, and BOND, HENRY in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3596 Decided by a vote of 4-0 to: (1) make a final determination that MAINTAINING ALL REPUBLICANS IN OFFICE PAC, and ROSEMARY CANALS in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3597 Decided by a vote of 4-0 to: (1) make a final determination that MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE, and MARQUARDT, DANIEL B in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3599 Decided by a vote of 4-0 to: (1) make a final determination that NATIONAL EMERGENCY MEDICINE POLITICAL ACTION COMMITTEE / AMERICAN COLLEGE OF EMERGENCY PHYSICIANS, and POWERS, LAYLA MRS. MBA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3600 Decided by a vote of 4-0 to: (1) make a final determination that NATIONAL STAR ROUTE MAIL CONTRACTORS ASSOCIATION POLITICAL ACTION COMMITTEE, and MARANEY, JOHN V. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3601 Decided by a vote of 4-0 to: (1) make a final determination that NATIONAL TURKEY FEDERATION POLITICAL ACTION COMMITTEE/TURPAC, and BRANDENBERGER, JOEL in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3602 Decided by a vote of 4-0 to: (1) make a final determination that NEW NATION RISING, and OGUNNAIKE, OLUFEMI in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3603 Decided by a vote of 4-0 to: (1) make a final determination that NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC, and PARKER, PHILLIP JACOB JR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3604 Decided by a vote of 4-0 to: (1) make a final determination that NOVOCURE INC. PAC, and LONGSWORTH, TODD as treasurer in his official capacity violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3605 Decided by a vote of 4-0 to: (1) make a final determination that OHIOHEALTH STAR CORPORATION POLITICAL ACTION COMMITTEE DBA OHIOHEALTH PAC, and MORRISON, KAREN J in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3606 Decided by a vote of 4-0 to: (1) make a final determination that PIPEFITTERS LOCAL #533 VOLUNTEER POLITICAL FUND, and ROSEBURROUGH, CHARLES J in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3607 Decided by a vote of 4-0 to: (1) make a final determination that PLASTERERS' AND CEMENT MASONS' ACTION COMMITTEE, and SEXTON, KEVIN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3608 Decided by a vote of 4-0 to: (1) make a final determination that RENEWABLE ENERGY GROUP INC POLITICAL ACTION COMMITTEE (REG PAC), and HULEN, ANTHONY as in his official capacity treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3609 Decided by a vote of 4-0 to: (1) make a final determination that SEABOARD CORPORATION POLITICAL ACTION COMMITTEE, and DANNOV, DAVID in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3610 Decided by a vote of 4-0 to: (1) make a final determination that SNACK FOOD ASSOCIATION POLITICAL ACTION COMMITTEE (SNACKPAC), and HIXSON, JESSICA in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3611 Decided by a vote of 4-0 to: (1) make a final determination that SOUTHEAST COTTON COMMITTEE (SECC) SOUTHERN COTTONGROWERS INC/SE COTTON GINNERS ASSN, and RUPPENICKER, DAVID in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money

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penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3612 Decided by a vote of 4-0 to: (1) make a final determination that SUPPORTING CONSERVATIVES OF TODAY AND TOMORROW (SCOTT PAC), and YSAIS, STEVEN JOSEPH in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3613 Decided by a vote of 4-0 to: (1) make a final determination that TEXTILE RENTAL SERVICES ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE (TRSAPAC), and THOMAS NEWELL in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3614 Decided by a vote of 4-0 to: (1) make a final determination that U.S.-CUBA DEMOCRACY POLITICAL ACTION COMMITTEE, and MACHADO, GUS MR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3615 Decided by a vote of 4-0 to: (1) make a final determination that UNITED BROTHERHOOD OF CARPENTERS/JOINERS OF AMER NEW ENGLAND REG CARPENTERS LEGIS EMP CMTE, and STEPHEN, JOYCE in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3616 Decided by a vote of 4-0 to: (1) make a final determination that UNITED MINE WORKERS OF AMERICA POWER PAC, and ALLEN, LEVI in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3617 Decided by a vote of 4-0 to: (1) make a final determination that WESTERN GROWERS POLITICAL ACTION COMMITTEE, and TITUS, ASHLEE N. in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and assess the final

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civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Attest:



Laura Sinram

Digitally signed by Laura
Sinram
Date: 2020.07.31 16:00:30
-04'00'

Laura E. Sinram
Acting Secretary and Clerk of the
Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AF

August 3, 2020

Brooke Pendley, in official capacity as Treasurer
Club for Conservatives
3540 Clemmons Rd., Suite 121
Clemmons, NC 27012

C00658302

AF#: 3587

Dear Ms. Pendley,

On March 14, 2019, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Club for Conservatives and you, in your official capacity as treasurer violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2018 Pre-General Report. By letter dated March 15, 2019, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$820 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, you, as treasurer, were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The FEC made a final determination on June 29, 2020 that Club for Conservatives and you, in your official capacity as treasurer violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$820 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Election Sensitive

Level of Activity: \$6,403

Number of Days Late: Not Filed (reports not filed prior to four (4) days before the General Election held on November 6, 2018 are considered not filed for the purposes 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 Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within thirty (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

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final determination be modified or set aside. See 52 U.S.C. § 30109(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. 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 thirty (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 five (5) days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% 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, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**4. Partial Payments**

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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) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Jacqueline Gausepohl at Federal Election Commission, 1050 First St., NE, Washington, DC 20002, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

Sincerely,



James E. "Trey" Trainor III
Chair

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$820 for the 2018 Pre-General Report. The payment is due within 30 days of receipt of this letter.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative

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Fine Program Payment form. Please use the details below to complete the required fields. For additional payment options, please contact Jacqueline Gausepohl in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

COMMITTEE NAME: Club for Conservatives

FEC ID#: C00658302

AF#: 3587

PAYMENT AMOUNT DUE: \$820

THIS IS THE END OF ADMINISTRATIVE FINE CASE #3587