

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #3613

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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* Kristin D. Roser/Ben Holly *BH*
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 $29.82\% (17 \text{ days (12G Filing Period)})/57 \text{ days (30G Filing Period)}$. 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 $18.48\% (17 \text{ days (12G Filing Period)})/92 \text{ days (YE Filing Period)}$. 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 |

3/12/2019 12:00 PM

| 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 |

3/12/2019 12:00 PM

| 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 | | DAVID RUPPENICKER | \$365,812 | 0 | 1/28/2019 | Not Filed | \$2,500 | \$684 |
| 3612 | C00453324 | SUPPORTING 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 |) |
| |) |
| Reason To Believe Recommendation - 2018 |) |
| 12 Day Pre-General Report (Unauthorized |) |
| Committees - Quarterly Filers): |) |
| 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; |) |
| CONCORDIA POLITICAL ACTION |) AF# 3588 |
| COMMITTEE, INC., and KING, DANIEL |) |
| T as treasurer; |) |
| CONSERVATIVE OPPORTUNITIES FOR |) AF# 3589 |
| A NEW AMERICA PAC, and BAIN, |) |
| WILLIAM R. MR. as treasurer; |) |

Federal Election Commission
Certification for Administrative Fines
March 14, 2019

Page 2

| | | |
|------------------------------------|---|----------|
| 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 ROBERT B. |) | |
| ASHER 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 LYLE J PARRY as |) | |
| treasurer; |) | |
| MAYNARD COOPER & GALE PC PAC, |) | AF# 3598 |
| and WILSON, DANIEL M as treasurer; |) | |
| NATIONAL EMERGENCY MEDICINE |) | AF# 3599 |
| POLITICAL ACTION COMMITTEE / |) | |
| AMERICAN COLLEGE OF |) | |
| EMERGENCY PHYSICIANS, and |) | |
| POWERS, LAYLA MRS. MBA as |) | |
| treasurer; |) | |
| NATIONAL STAR ROUTE MAIL |) | AF# 3600 |
| CONTRACTORS ASSOCIATION |) | |
| POLITICAL ACTION COMMITTEE, and |) | |
| MARANEY, 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; |) | |

Federal Election Commission
 Certification for Administrative Fines
 March 14, 2019

Page 3

| | | |
|------------------------------------|---|----------|
| 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 KAREN J |) | |
| MORRISON as treasurer; |) | |
| PIPEFITTERS LOCAL UNION #533 |) | AF# 3606 |
| VOLUNTEER POLITICAL FUND, and |) | |
| SCOTT FORBES 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; |) | |
| 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; |) | |

Federal Election Commission
 Certification for Administrative Fines
 March 14, 2019

Page 4

| | | |
|--------------------------------|---|----------|
| 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 KENNEDY, |) | |
| WARD MR. 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 took the following actions on the Reason To Believe Recommendation - 2018 12 Day Pre-General Report (Unauthorized Committees - Quarterly Filers) as recommended in the Reports Analysis Division's Memorandum dated March 12, 2019, on the following committees:

AF#3576 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3577 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
March 14, 2019

Page 5

AF#3578 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3579 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3580 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3581 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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

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

Federal Election Commission
Certification for Administrative Fines
March 14, 2019

Page 6

AF#3584 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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

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

AF#3588 Decided by a vote of 4-0 to: (1) find reason to believe that CONCORDIA POLITICAL ACTION COMMITTEE, INC., and KING, DANIEL T in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3589 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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

Federal Election Commission
Certification for Administrative Fines
March 14, 2019

Page 7

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

AF#3592 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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

AF#3594 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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

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

Federal Election Commission
Certification for Administrative Fines
March 14, 2019

Page 8

AF#3597 Decided by a vote of 4-0 to: (1) find reason to believe that MANAGEMENT AND TRAINING CORPORATION POLITICAL ACTION COMMITTEE, and LYLE J PARRY in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3598 Decided by a vote of 4-0 to: (1) find reason to believe that MAYNARD COOPER & GALE PC PAC, and WILSON, DANIEL M in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3599 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3600 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3601 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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

Federal Election Commission
Certification for Administrative Fines
March 14, 2019

Page 9

AF#3603 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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

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

AF#3606 Decided by a vote of 4-0 to: (1) find reason to believe that PIPEFITTERS LOCAL UNION #533 VOLUNTEER POLITICAL FUND, and SCOTT FORBES in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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

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

Federal Election Commission
Certification for Administrative Fines
March 14, 2019

Page 10

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

AF#3610 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3611 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3612 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3613 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3614 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
March 14, 2019

Page 11

AF#3615 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3616 Decided by a vote of 4-0 to: (1) find reason to believe 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 make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3617 Decided by a vote of 4-0 to: (1) find reason to believe that WESTERN GROWERS POLITICAL ACTION COMMITTEE, and KENNEDY, WARD MR. in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, 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

Thomas Newell, in official capacity as Treasurer
Textile Rental Services Association of America Political
Action Committee (TRSAPAC)
1800 Diagonal Road Suite 200
Alexandria, VA 22314

C00279828
AF#: 3613

Dear Mr. Newell:

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 Textile Rental Services Association of America Political Action Committee (TRSAPAC) 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 \$7,267. 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 \$7,267 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: \$135,000

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 Textile Rental Services Association of America Political Action Committee (TRSAPAC) 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 \$7,267 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: Textile Rental Services Association of America Political Action Committee (TRSAPAC)

FEC ID#: C00279828

AF#: 3613

PAYMENT DUE DATE: April 23, 2019

PAYMENT AMOUNT DUE: \$7,267



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
KDR *BH*

BY: Kristin D. Roser/Ben Holly
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 FARMPAC | | 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 |

Federal Election Commission
 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; |) |

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

Page 2

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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; |) |

Federal Election Commission
 Certification for Withdrawal and
 Resubmission of Final Determination
 Recommendation – 2018 12 Day Pre-
 General Report (Unauthorized
 Committees-Quarterly Filers) for the
 Administrative Fine Program
 June 29, 2020

Page 3

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|------------------------------------|---|----------|
| NATIONAL STAR ROUTE MAIL |) | AF# 3600 |
| CONTRACTORS ASSOCIATION |) | |
| POLITICAL ACTION COMMITTEE, and |) | |
| MARANEY, 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; |) | |

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

Page 4

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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; |) |

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

Page 5

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

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

Page 6

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.

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

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.

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

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.

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

Page 9

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.

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

Page 10

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

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

Page 11

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

Federal Election Commission
Certification for Withdrawal and
Resubmission of Final Determination
Recommendation – 2018 12 Day Pre-
General Report (Unauthorized
Committees-Quarterly Filers) for the
Administrative Fine Program
June 29, 2020

Page 12

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



July 31, 2020

Date

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

Thomas Newell, in official capacity as Treasurer
 Textile Rental Services Association of America Political Action Committee (TRSAPAC)
 1800 Diagonal Road, Suite 200
 Alexandria, VA 22314

C00279828
 AF#: 3613

Dear Mr. Newell,

On March 14, 2019, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Textile Rental Services Association of America Political Action Committee (TRSAPAC) 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 totaling \$7,267 in accordance with the schedule of penalties at 11 CFR § 111.43.

On April 5, 2019, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on June 29, 2020 that Textile Rental Services Association of America Political Action Committee (TRSAPAC) and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$7,267 in accordance with 11 CFR § 111.43, and voted to close the file.

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 this matter, please contact Jacqueline Gausepohl on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "J.E. Trainor, III".

James E. "Trey" Trainor III
 Chair

THIS IS THE END OF ADMINISTRATIVE FINE CASE #3613