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THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #3632



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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SENSITIVE

March 20, 2019

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

SUBJECT: Reason To Believe Recommendation - 2018 30 Day Post-General Report
(Unauthorized Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2018 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2018 30 Day Post-General Report.

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

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

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2018 through November 26, 2018 (57 days), was reviewed for activity which would have required the filing of a 12 Day Pre-General Report (12 Day Report). If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, 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 activity was used by multiplying the total amount of activity on the report by 29.82% (17 days (12G Filing Period)/57 days (30G Filing Period)).
- The committees identified through this process as failing to file or failing to timely file the 12 Day Report were included in the Reason to Believe Recommendation circulated to the Commission on March 13, 2019. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Report based on the estimated levels of activity described above and are included on the attached list.
- 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 30G. If our research indicated that a 30G was required, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. 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 61.96% (57 days (30G 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 30G. If the same committee was required to file the 12 Day Report, but failed to file this report, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. 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 43.48% (40 days (30G 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 30G.

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.

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Federal Election Commission
Reason to Believe Circulation Report
2018 POST-GENERAL Not Election Sensitive 12/06/2018 UNAUTH

| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|---|----------------------|-------------|----|--------------|-----------------|-----------------|-------------|
| 3620 | C00230342 | 21ST CENTURY DEMOCRATS | BILL COMBS | \$3,973,816 | 0 | 12/12/2018 | 6 | \$512,067 | \$5,373 |
| 3621 | C00623256 | AMERICA COMES FIRST PAC | DAVID W. SCHAMENS | \$154,404 | 5 | | Not Filed | \$154,404 (est) | \$17,986 |
| 3622 | C00492579 | AMERICAN PRINCIPLES | EYTAN LAOR | \$313,566 | 1 | 1/23/2019 | 48 (Not Filed*) | \$52,662 | \$4,906 |
| 3623 | C00107615 | AMERICAN RENTAL ASSOCIATION POLITICAL ACTION COMMITTEE | JOHN W. MCCLELLAND | \$281,851 | 0 | 12/12/2018 | 6 | \$9,000 | \$104 |
| 3624 | C00658757 | AMERICANS SUPPORTING VETERANS PAC | MARK SLY | \$576,156 | 0 | 12/23/2018 | 17 | \$78,172 | \$3,063 |
| 3625 | C00358366 | ANDEAVOR LLC POLITICAL ACTION COMMITTEE | TRAVIS J. HUNT | \$1,117,454 | 0 | 12/20/2018 | 14 | \$25,696 | \$682 |
| 3626 | C00525295 | BALDWIN WISCONSIN VICTORY FUND | GLENN CARLSON | \$3,576,069 | 0 | 12/13/2018 | 7 | \$969,040 | \$9,297 |
| 3627 | C00415752 | BORDER HEALTH FEDERAL PAC | ERNIE PEREZ | \$1,574,771 | 0 | 1/31/2019 | 56 (Not Filed*) | \$100,013 | \$6,541 |
| 3628 | C00613810 | BRAND NEW CONGRESS | ISRA ALLISON | \$1,192,422 | 0 | 1/23/2019 | 48 (Not Filed*) | \$79,148 | \$5,086 |
| 3629 | C00589200 | BROADER REPRESENTATION ADVOCACY TEAM - POLITICAL ACTION COMMITTEE | JASPER HENDRICKS III | \$250,000 | 0 | 12/21/2018 | 15 | \$50,000 | \$2,087 |
| 3630 | C00667667 | BUILD THE WAVE | NATHAN LERNER | \$406,864 | 0 | 1/4/2019 | 29 | \$203,992 | \$8,819 |
| 3631 | C00341990 | CAROLYN'S PAC | MELISSA A. MENDEZ | \$588,039 | 0 | 12/28/2018 | 22 | \$13,571 | \$278 |
| 3632 | C00344770 | COMPTTEL PAC | JULIA STROW | \$100,963 | 0 | 12/24/2018 | 18 | \$10,580 | \$254 |
| 3633 | C00167320 | CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE | MICHAEL POHL | \$5,978,238 | 0 | 12/13/2018 | 7 | \$1,164,697 | \$9,297 |
| 3634 | C00634717 | CONSERVATIVE TRIUMPH FUND | RONALD RAMIREZ | \$351,435 | 0 | 12/13/2018 | 7 | \$29,472 | \$486 |
| 3635 | C00000489 | D R I V E POLITICAL FUND CHAPTER 886 | TOM RITTER | \$109,457 | 0 | 1/30/2019 | 55 (Not Filed*) | \$3,044 | \$341 |
| 3636 | C00650432 | DEMOCRATS WORK FOR AMERICA, INC | SUDHA KAILAR | \$404,885 | 0 | 12/31/2018 | 25 | \$168,185 | \$6,589 |
| 3637 | C00618033 | GRASSROOTS AWARENESS PAC | PAM MATTSON | \$2,353,115 | 0 | | Not Filed | \$784,372 (est) | \$15,987 |
| 3638 | C00062836 | KENTUCKY BANKERS POLITICAL ACTION COMMITTEE | MATT VANCE | \$503,520 | 0 | 12/21/2018 | 15 | \$47,854 | \$710 |
| 3639 | C00315713 | LIBERTARIAN PARTY OF ILLINOIS | BRIAN W. DUNN | \$298,564 | 0 | 12/22/2018 | 16 | \$5,213 | \$164 |
| 3640 | C00676429 | LIBERTY FOR US SUPER PAC | BRAD JOHNSON | \$170,519 | 0 | | Not Filed | \$85,260 (est) | \$5,086 |
| 3641 | C00076182 | NATIONAL TURKEY FEDERATION POLITICAL ACTION COMMITTEE/TURPAC | JOEL BRANDENBERGER | \$818,389 | 0 | 12/17/2018 | 11 | \$2,000 | \$101 |

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| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--|----------------------------|-------------|----|--------------|-----------------|-----------------|-------------|
| 3642 | C00634964 | NEW NATION RISING | OLUFEMI OGUNNAIKE | \$1,512,947 | 0 | | Not Filed | \$252,158 (est) | \$11,627 |
| 3643 | C00636902 | NY19VOTES | LINDA SAKAI | \$140,992 | 0 | 12/17/2018 | 11 | \$5,468 | \$134 |
| 3644 | C00157941 | PEACE ACTION PAC/ FKA SANE/FREEZE PAC | ROSALIE GREENE | \$167,510 | 0 | 12/26/2018 | 20 | \$76,996 | \$3,501 |
| 3645 | C00131706 | PIPEFITTERS LOCAL UNION #524 | PATRICK DOLAN | \$194,859 | 0 | | Not Filed | \$32,477 (est) | \$1,230 |
| 3646 | C00206177 | PIPEFITTERS LOCAL UNION #533 VOLUNTEER POLITICAL FUND | SCOTT FORBES | \$1,042,729 | 0 | 12/12/2018 | 6 | \$12,580 | \$182 |
| 3647 | C00634766 | RAND PAUL VICTORY | KEVIN BROGHAMER | \$515,785 | 0 | 1/30/2019 | 55 (Not Filed*) | \$71,622 | \$3,925 |
| 3648 | C00436410 | ROCK CITY PAC | KIMBERLY KAEGI | \$526,134 | 1 | 12/14/2018 | 8 | \$13,899 | \$242 |
| 3649 | C00671040 | RURAL PROGRESS | NATHANIEL IRVIN | \$110,372 | 0 | | Not Filed | \$36,791 (est) | \$1,230 |
| 3650 | C00617712 | SASSE LEADERSHIP COMMITTEE | STEVE RALLS | \$1,197,130 | 0 | 1/31/2019 | 56 (Not Filed*) | \$22,162 | \$684 |
| 3651 | C00510974 | STATE OF HAWAII ORGANIZATION OF POLICE OFFICERS (SHOPO POLITICAL ACTION FUND) | JAMES M. SMITH | \$140,810 | 0 | 12/20/2018 | 14 | \$2,736 | \$119 |
| 3652 | C00626739 | STOP THE SPEAKER PAC | JEREMY LEVINSON | \$518,754 | 0 | 1/31/2019 | 56 (Not Filed*) | \$2,731 | \$341 |
| 3653 | C00488403 | TEXAS PATRIOTS PAC | WILLIAM J. O'SULLIVAN, JR. | \$227,522 | 0 | 12/21/2018 | 15 | \$50,413 | \$2,087 |
| 3654 | C00512855 | THE FUND FOR AMERICAN EXCEPTIONALISM | REGAN BONDERMAN | \$317,365 | 0 | 12/14/2018 | 8 | \$26,475 | \$514 |
| 3655 | C00522458 | TOGETHER WE THRIVE | CHRISTOPHER ZULLO | \$133,515 | 0 | | Not Filed | \$19,074 (est) | \$684 |
| 3656 | C00495887 | TOMORROW IS MEANINGFUL PAC | STACY WIGGINS | \$1,626,845 | 0 | 12/13/2018 | 7 | \$104,425 | \$2,145 |
| 3657 | C00138974 | TTX PAC | PATRICK B. LOFTUS | \$164,888 | 0 | 12/14/2018 | 8 | \$12,608 | \$194 |
| 3658 | C00139667 | UGI CORPORATION POLITICAL ACTION COMMITTEE(UGI/PAC) | DANIELLE DICKERT | \$116,515 | 0 | 12/27/2018 | 21 | \$4,040 | \$161 |
| 3659 | C00558668 | ULTRA ELECTRONICS USA GROUP INC PAC (ULTRA ELECTRONICS USA PAC OR UEUSA PAC) | SCOTT A. MEYERS | \$130,037 | 0 | 1/24/2019 | 49 (Not Filed*) | \$1,134 | \$341 |
| 3661 | C00634915 | YOUNG HOOSIER VICTORY FUND | KEVIN BROGHAMER | \$1,136,676 | 0 | 12/22/2018 | 16 | \$30,065 | \$738 |

* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|--|---|----------|
| In the Matter of |) | |
| |) | |
| Reason To Believe Recommendation - 2018 |) | |
| 30 Day Post-General Report (Unauthorized |) | |
| Filers) for the Administrative Fine Program: |) | |
| 21ST CENTURY DEMOCRATS, and |) | AF# 3620 |
| COMBS, BILL as treasurer; |) | |
| AMERICA COMES FIRST PAC, and |) | AF# 3621 |
| SCHAMENS, DAVID W MR. as treasurer; |) | |
| AMERICAN PRINCIPLES, and LAOR, |) | AF# 3622 |
| EYTAN as treasurer; |) | |
| AMERICAN RENTAL ASSOCIATION |) | AF# 3623 |
| POLITICAL ACTION COMMITTEE, and |) | |
| MCCLELLAND, JOHN W. MR. as |) | |
| treasurer; |) | |
| AMERICANS SUPPORTING VETERANS |) | AF# 3624 |
| PAC, and SLY, MARK as treasurer; |) | |
| ANDEAVOR LLC POLITICAL ACTION |) | AF# 3625 |
| COMMITTEE, and HUNT, TRAVIS J. as |) | |
| treasurer; |) | |
| BALDWIN WISCONSIN VICTORY |) | AF# 3626 |
| FUND, and CARLSON, GLENN as |) | |
| treasurer; |) | |
| BORDER HEALTH FEDERAL PAC, and |) | AF# 3627 |
| ERNIE PEREZ as treasurer; |) | |
| BRAND NEW CONGRESS, and |) | AF# 3628 |
| ALLISON, ISRA as treasurer; |) | |
| BROADER REPRESENTATION |) | AF# 3629 |
| ADVOCACY TEAM - POLITICAL |) | |
| ACTION COMMITTEE, and |) | |
| HENDRICKS, JASPER III as treasurer; |) | |
| BUILD THE WAVE, and NATHAN |) | AF# 3630 |
| LERNER as treasurer; |) | |
| CAROLYN'S PAC, and MENDEZ, |) | AF# 3631 |
| MELISSA A. MS as treasurer; |) | |
| COMPTTEL PAC, and STROW, JULIA as |) | AF# 3632 |
| treasurer; |) | |
| CONNECTICUT DEMOCRATIC STATE |) | AF# 3633 |
| CENTRAL COMMITTEE, and POHL, |) | |
| MICHAEL as treasurer; |) | |
| CONSERVATIVE TRIUMPH FUND, and |) | AF# 3634 |
| RAMIREZ, RONALD as treasurer; |) | |

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| DRIVE POLITICAL FUND CHAPTER 886, and TOM RITTER as treasurer; |) | AF# 3635 |
| DEMOCRATS WORK FOR AMERICA, INC, and KAILAR, SUDHA as treasurer; |) | AF# 3636 |
| GRASSROOTS AWARENESS PAC, and MATTSON, PAM as treasurer; |) | AF# 3637 |
| KENTUCKY BANKERS POLITICAL ACTION COMMITTEE, and MATT VANCE as treasurer; |) | AF# 3638 |
| LIBERTARIAN PARTY OF ILLINOIS, and DUNN, BRIAN W. as treasurer; |) | AF# 3639 |
| LIBERTY FOR US SUPER PAC, and JOHNSON, BRAD as treasurer; |) | AF# 3640 |
| NATIONAL TURKEY FEDERATION POLITICAL ACTION COMMITTEE/TURPAC, and BRANDENBERGER, JOEL as treasurer; |) | AF# 3641 |
| NEW NATION RISING, and OGUNNAIKE, OLUFEMI as treasurer; |) | AF# 3642 |
| NY19VOTES, and SAKAI, LINDA as treasurer; |) | AF# 3643 |
| PEACE ACTION PAC/ FKA SANE/FREEZE PAC, and ROSALIE GREENE as treasurer; |) | AF# 3644 |
| PIPEFITTERS LOCAL UNION #524, and DOLAN, PATRICK as treasurer; |) | AF# 3645 |
| PIPEFITTERS LOCAL UNION #533 VOLUNTEER POLITICAL FUND, and SCOTT FORBES as treasurer; |) | AF# 3646 |
| RAND PAUL VICTORY, and BROGHAMER, KEVIN as treasurer; |) | AF# 3647 |
| ROCK CITY PAC, and KAEGI, KIMBERLY as treasurer; |) | AF# 3648 |
| RURAL PROGRESS, and IRVIN, NATHANIEL as treasurer; |) | AF# 3649 |
| SASSE LEADERSHIP COMMITTEE, and RALLS, STEVE as treasurer; |) | AF# 3650 |
| STATE OF HAWAII ORGANIZATION OF POLICE OFFICERS (SHOPO POLITICAL ACTION FUND), and SMITH, JAMES M MR. as treasurer; |) | AF# 3651 |
| STOP THE SPEAKER PAC, and LEVINSON, JEREMY as treasurer; |) | AF# 3652 |
| TEXAS PATRIOTS PAC, and WILLIAM J. O'SULLIVAN, JR. as treasurer; |) | AF# 3653 |

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| THE FUND FOR AMERICAN |) | AF# 3654 |
| EXCEPTIONALISM, and BONDERMAN, |) | |
| REGAN MRS. as treasurer; |) | |
| TOGETHER WE THRIVE, and |) | AF# 3655 |
| CHRISTOPHER ZULLO as treasurer; |) | |
| TOMORROW IS MEANINGFUL PAC, |) | AF# 3656 |
| and WIGGINS, STACY as treasurer; |) | |
| TTX PAC, and PATRICK B LOFTUS as |) | AF# 3657 |
| treasurer; |) | |
| UGI CORPORATION POLITICAL |) | AF# 3658 |
| ACTION COMMITTEE(UGI/PAC), and |) | |
| DICKERT, DANIELLE as treasurer; |) | |
| ULTRA ELECTRONICS USA GROUP |) | AF# 3659 |
| INC PAC (ULTRA ELECTRONICS USA |) | |
| PAC OR UEUSA PAC), and MEYERS, |) | |
| SCOTT A as treasurer; |) | |
| YOUNG HOOSIER VICTORY FUND, and |) | AF# 3661 |
| BROGHAMER, KEVIN as treasurer; |) | |

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission,
 do hereby certify that on March 21, 2019 the Commission took the following actions
 on the Reason To Believe Recommendation - 2018 30 Day Post-General Report
 (Unauthorized Filers) for the Administrative Fine Program as recommended in the
 Reports Analysis Division's Memorandum dated March 20, 2019, on the following
 committees:

AF#3620 Decided by a vote of 4-0 to: (1) find reason to believe that 21ST
 CENTURY DEMOCRATS, and COMBS, BILL 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#3621 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W 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#3622 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICAN PRINCIPLES, and LAOR, EYTAN 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#3623 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICAN RENTAL ASSOCIATION POLITICAL ACTION COMMITTEE, and MCCLELLAND, JOHN W. 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#3624 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICANS SUPPORTING VETERANS PAC, and SLY, MARK 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#3625 Decided by a vote of 4-0 to: (1) find reason to believe that ANDEAVOR LLC POLITICAL ACTION COMMITTEE, and HUNT, TRAVIS 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#3626 Decided by a vote of 4-0 to: (1) find reason to believe that BALDWIN WISCONSIN VICTORY FUND, and CARLSON, GLENN 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.

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AF#3627 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#3628 Decided by a vote of 4-0 to: (1) find reason to believe that BRAND NEW CONGRESS, and ALLISON, ISRA 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#3629 Decided by a vote of 4-0 to: (1) find reason to believe that BROADER REPRESENTATION ADVOCACY TEAM - POLITICAL ACTION COMMITTEE, and HENDRICKS, JASPER III 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#3630 Decided by a vote of 4-0 to: (1) find reason to believe that BUILD THE WAVE, and NATHAN LERNER 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#3631 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#3632 Decided by a vote of 4-0 to: (1) find reason to believe that COMPTTEL PAC, and STROW, JULIA 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#3633 Decided by a vote of 4-0 to: (1) find reason to believe that CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE, and POHL, MICHAEL 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#3634 Decided by a vote of 4-0 to: (1) find reason to believe that CONSERVATIVE TRIUMPH FUND, and RAMIREZ, RONALD 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#3635 Decided by a vote of 4-0 to: (1) find reason to believe that D R I V E POLITICAL FUND CHAPTER 886, and TOM RITTER 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#3636 Decided by a vote of 4-0 to: (1) find reason to believe that DEMOCRATS WORK FOR AMERICA, INC, and KAILAR, SUDHA 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#3637 Decided by a vote of 4-0 to: (1) find reason to believe that GRASSROOTS AWARENESS PAC, and MATTSON, PAM 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#3638 Decided by a vote of 4-0 to: (1) find reason to believe that KENTUCKY BANKERS POLITICAL ACTION COMMITTEE, and MATT VANCE 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#3639 Decided by a vote of 4-0 to: (1) find reason to believe that LIBERTARIAN PARTY OF ILLINOIS, and DUNN, BRIAN W. 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.

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AF#3640 Decided by a vote of 4-0 to: (1) find reason to believe that LIBERTY FOR US SUPER PAC, and JOHNSON, BRAD 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#3641 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#3642 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.

AF#3643 Decided by a vote of 4-0 to: (1) find reason to believe that NY19VOTES, and SAKAI, LINDA 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#3644 Decided by a vote of 4-0 to: (1) find reason to believe that PEACE ACTION PAC/ FKA SANE/FREEZE PAC, and ROSALIE GREENE 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#3645 Decided by a vote of 4-0 to: (1) find reason to believe that PIPEFITTERS LOCAL UNION #524, and DOLAN, 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#3646 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#3647 Decided by a vote of 4-0 to: (1) find reason to believe that RAND PAUL VICTORY, and BROGHAMER, 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#3648 Decided by a vote of 4-0 to: (1) find reason to believe that ROCK CITY PAC, and KAEGI, KIMBERLY 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#3649 Decided by a vote of 4-0 to: (1) find reason to believe that RURAL PROGRESS, and IRVIN, NATHANIEL 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#3650 Decided by a vote of 4-0 to: (1) find reason to believe that SASSE LEADERSHIP COMMITTEE, and RALLS, STEVE 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#3651 Decided by a vote of 4-0 to: (1) find reason to believe that STATE OF HAWAII ORGANIZATION OF POLICE OFFICERS (SHOPO POLITICAL ACTION FUND), and SMITH, JAMES M 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
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AF#3652 Decided by a vote of 4-0 to: (1) find reason to believe that STOP THE SPEAKER PAC, and LEVINSON, JEREMY 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#3653 Decided by a vote of 4-0 to: (1) find reason to believe that TEXAS PATRIOTS PAC, and WILLIAM J. O'SULLIVAN, 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#3654 Decided by a vote of 4-0 to: (1) find reason to believe that THE FUND FOR AMERICAN EXCEPTIONALISM, and BONDERMAN, REGAN MRS. 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#3655 Decided by a vote of 4-0 to: (1) find reason to believe that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO 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#3656 Decided by a vote of 4-0 to: (1) find reason to believe that TOMORROW IS MEANINGFUL PAC, and WIGGINS, STACY 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#3657 Decided by a vote of 4-0 to: (1) find reason to believe that TTX PAC, and PATRICK B LOFTUS 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.

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AF#3658 Decided by a vote of 4-0 to: (1) find reason to believe that UGI CORPORATION POLITICAL ACTION COMMITTEE(UGI/PAC), and DICKERT, DANIELLE 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#3659 Decided by a vote of 4-0 to: (1) find reason to believe that ULTRA ELECTRONICS USA GROUP INC PAC (ULTRA ELECTRONICS USA PAC OR UEUSA PAC), and MEYERS, SCOTT 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.

AF#3661 Decided by a vote of 4-0 to: (1) find reason to believe that YOUNG HOOSIER VICTORY FUND, and BROGHAMER, 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.

Attest:

March 21, 2019

Date



Dayna C. Brown

Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 21, 2019

Julia Strow, in official capacity as Treasurer
Comptel PAC
2025 M Street NW, Suite 800
Washington, DC 20036

C00344770
AF#: 3632

Dear Ms. Strow:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2018 through November 26, 2018 shall be filed no later than December 6, 2018. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on December 24, 2018, 18 days late.

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. § 30109g(a)(4). On March 21, 2019, the FEC found that there is reason to believe ("RTB") that Comptel PAC 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 December 6, 2018. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$254. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <https://www.fec.gov/af/pay.shtml> 11 CFR § 111.34. Your payment of \$254 is due within forty (40) days of the finding, or by April 30, 2019, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive
Level of Activity: \$10,580
Number of Days Late: 18
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 30, 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 Comptel PAC 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 \$254 for the 2018 Post-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: Comptel PAC

FEC ID#: C00344770

AF#: 3632

PAYMENT DUE DATE: April 30, 2019

PAYMENT AMOUNT DUE: \$254

RECEIVED

By Office of the Commission Secretary at 9:51 am, Jun 08, 2020



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

SUBJECT: Withdrawal and Resubmission of Final Determination Recommendation – 2018 30 Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on November 18, 2019 in order to reflect updates disclosed in filings received by the Commission after the initial submission of this recommendation. On January 22, 2020, Liberty for Us Super PAC (AF 3640) filed a 2018 30 Day Post-General Report that disclosed a level of activity lower than previously estimated and an Amended Statement of Organization disclosing a new treasurer. The circulation chart has been updated to reflect the level of activity, final civil money penalty amounts and treasurer information disclosed on the most recent filings. The circulation chart was also updated to reflect a change in the Treasurer for UGI Corporation Political Action Committee (UGI/PAC) (AF 3658).

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 30 Day Post-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 entire 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.

The Reports Analysis Division (RAD) recommends that the Commission take no further action against Broader Representation Advocacy Team – Political Action Committee (AF 3629). After RTB, it was discovered that the committee may not have reported actual campaign finance related activity on the 2018 30 Day Post-General Report. The committee appears to be a fictitious filer and will be addressed in accordance with the RAD Review and Referral Procedures. As such, RAD recommends no further action against Broader Representation Advocacy Team – Political Action Committee.

For your information, two (2) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Grassroots Awareness PAC (AF 3637) disclosed no activity after the RTB finding (previously estimated to be \$784,372), which would result in no civil money penalty (fine previously assessed to be \$15,987).

Liberty for Us Super PAC (AF 3640) filed the 2018 30 Day Post-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 \$903 (previously estimated to be \$85,260), thus the fine would be lowered from \$5,086 to \$341.

For your information, six (6) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

Brand New Congress (AF 3628) filed an Amended Statement of Organization after the RTB finding designating Amy Vilela as Treasurer.

Connecticut Democratic State Central Committee (AF 3633) filed an Amended Statement of Organization after the RTB finding designating Eloisa Melendez as Treasurer.

D.R.I.V.E. Political Fund Chapter 886 (AF 3635) filed an Amended Statement of Organization after the RTB finding designating Jerry Sims as Treasurer.

Liberty for US Super PAC (AF 3640) filed an Amended Statement of Organization after the RTB finding designating Chris Marston as Treasurer.

Pipefitters Local #533 Volunteer Political Fund (AF 3646) filed an Amended Statement of Organization after the RTB finding designating Charles Roseburrough as Treasurer.

Texas Patriots PAC (AF 3653) filed an Amended Statement of Organization after the RTB finding designating Cynthia Gaskill as Treasurer.

UGI Corporation PAC (UGI/PAC) (AF 3658) filed an Amended Statement of Organization after the RTB finding designating David Pettine as Treasurer.

RAD Recommendation

- (1) Take no further action against Broader Representation Advocacy Team – Political Action Committee and Jasper Hendricks, in his official capacity as treasurer, in regards to AF 3629.
- (2) 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.
- (3) Make a final determination that the political committee and its treasurer, in her official capacity, listed on the attached report with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (4) Send the appropriate letters.

Federal Election Commission
FD Circulation Report Fine Paid
2018 POST-GENERAL Not Election Sensitive 12/06/2018 UNAUTH

| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|--|--------------|--------------------|--------------|------------|-------------|----|------------|-------------|---------------------|------------|-------------|
| 3623 | AMERICAN RENTAL ASSOCIATION POLITICAL ACTION COMMITTEE | C00107615 | JOHN W. MCCLELLAND | 12/12/2018 | 6 | \$9,000 | 0 | 03/21/2019 | \$104 | \$104 | 04/16/2019 | \$104 |
| 3625 | ANDEAVOR LLC POLITICAL ACTION COMMITTEE | C00358366 | TRAVIS J. HUNT | 12/20/2018 | 14 | \$25,696 | 0 | 03/21/2019 | \$682 | \$682 | 04/01/2019 | \$682 |
| 3626 | BALDWIN WISCONSIN VICTORY FUND | C00525295 | GLENN CARLSON | 12/13/2018 | 7 | \$967,560 | 0 | 03/21/2019 | \$9,297 | \$9,297 | 04/29/2019 | \$9,297 |
| 3631 | CAROLYN'S PAC | C00341990 | MELISSA A. MENDEZ | 12/28/2018 | 22 | \$13,571 | 0 | 03/21/2019 | \$278 | \$278 | 04/19/2019 | \$278 |
| 3632 | COMTEL PAC | C00344770 | JULIA STROW | 12/24/2018 | 18 | \$10,580 | 0 | 03/21/2019 | \$254 | \$254 | 04/30/2019 | \$254 |
| 3633 | CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE | C00167320 | ELOISA MELENDEZ | 12/13/2018 | 7 | \$1,164,697 | 0 | 03/21/2019 | \$9,297 | \$9,297 | 04/17/2019 | \$9,297 |
| 3634 | CONSERVATIVE TRIUMPH FUND | C00634717 | RONALD RAMIREZ | 12/13/2018 | 7 | \$29,472 | 0 | 03/21/2019 | \$486 | \$486 | 05/09/2019 | \$486 |
| 3635 | D R I V E POLITICAL FUND CHAPTER 886 | C00000489 | JERRY SIMS, JR. | 01/30/2019 | Not Filed* | \$3,044 | 0 | 03/21/2019 | \$341 | \$341 | 03/28/2019 | \$341 |
| 3638 | KENTUCKY BANKERS POLITICAL ACTION COMMITTEE | C00062836 | MATT VANCE | 12/21/2018 | 15 | \$47,854 | 0 | 03/21/2019 | \$710 | \$710 | 03/26/2019 | \$710 |
| 3639 | LIBERTARIAN PARTY OF ILLINOIS | C00315713 | RUSTY L. CLARK | 12/22/2018 | 16 | \$5,213 | 0 | 03/21/2019 | \$164 | \$164 | 04/12/2019 | \$164 |
| 3641 | NATIONAL TURKEY FEDERATION POLITICAL ACTION COMMITTEE/TURPAC | C00076182 | JOEL BRANDENBERGER | 12/17/2018 | 11 | \$2,000 | 0 | 03/21/2019 | \$101 | \$101 | 04/02/2019 | \$101 |
| 3643 | NY19VOTES | C00636902 | LINDA SAKAI | 12/17/2018 | 11 | \$5,468 | 0 | 03/21/2019 | \$134 | \$134 | 05/08/2019 | \$134 |
| 3647 | RAND PAUL VICTORY | C00634766 | KEVIN BROGHAMER | 01/30/2019 | Not Filed* | \$71,622 | 0 | 03/21/2019 | \$3,925 | \$3,925 | 04/03/2019 | \$3,925 |
| 3648 | ROCK CITY PAC | C00436410 | KIMBERLY KAEGI | 12/14/2018 | 8 | \$13,899 | 1 | 03/21/2019 | \$242 | \$242 | 04/12/2019 | \$242 |
| 3650 | SASSE LEADERSHIP COMMITTEE | C00617712 | STEVE RALLS | 01/31/2019 | Not Filed* | \$22,162 | 0 | 03/21/2019 | \$684 | \$684 | 04/23/2019 | \$684 |
| 3651 | STATE OF HAWAII ORGANIZATION OF POLICE OFFICERS (SHOPO POLITICAL ACTION FUND) | C00510974 | JAMES M. SMITH | 12/20/2018 | 14 | \$2,736 | 0 | 03/21/2019 | \$119 | \$119 | 04/26/2019 | \$119 |
| 3652 | STOP THE SPEAKER PAC | C00626739 | JEREMY LEVINSON | 01/31/2019 | Not Filed* | \$2,731 | 0 | 03/21/2019 | \$341 | \$341 | 05/16/2019 | \$341 |
| 3653 | TEXAS PATRIOTS PAC | C00488403 | CYNTHIA GASKILL | 12/21/2018 | 15 | \$50,413 | 0 | 03/21/2019 | \$2,087 | \$2,087 | 04/30/2019 | \$2,087 |
| 3654 | THE FUND FOR AMERICAN EXCEPTIONALISM | C00512855 | REGAN BONDERMAN | 12/14/2018 | 8 | \$26,475 | 0 | 03/21/2019 | \$514 | \$514 | 05/01/2019 | \$514 |
| 3656 | TOMORROW IS MEANINGFUL PAC | C00495887 | STACY WIGGINS | 12/13/2018 | 7 | \$104,425 | 0 | 03/21/2019 | \$2,145 | \$2,145 | 04/23/2019 | \$2,145 |
| 3657 | TTX PAC | C00138974 | PATRICK B. LOFTUS | 12/14/2018 | 8 | \$12,608 | 0 | 03/21/2019 | \$194 | \$194 | 04/10/2019 | \$194 |
| 3658 | UGI CORPORATION POLITICAL ACTION COMMITTEE(UGI/PAC) | C00139667 | DAVID PETTINE | 12/27/2018 | 21 | \$4,040 | 0 | 03/21/2019 | \$161 | \$161 | 04/01/2019 | \$161 |

| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|--|--------------|-----------------|--------------|------------|----------|----|------------|-------------|---------------------|------------|-------------|
| 3659 | ULTRA ELECTRONICS USA GROUP INC PAC (ULTRA ELECTRONICS USA PAC OR UEUSA PAC) | C00558668 | SCOTT A. MEYERS | 01/24/2019 | Not Filed* | \$830 | 0 | 03/21/2019 | \$341 | \$341 | 04/29/2019 | \$341 |
| 3661 | YOUNG HOOSIER VICTORY FUND | C00634915 | KEVIN BROGHAMER | 12/22/2018 | 16 | \$30,065 | 0 | 03/21/2019 | \$738 | \$738 | 05/08/2019 | \$738 |

* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

Federal Election Commission
FD Circulation Report Fine Not Paid
2018 POST-GENERAL Not Election Sensitive 12/06/2018 UNAUTH

| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Days Since RTB | FD Penalty |
|------|---|--------------|-------------------------|--------------|------------|-----------------|----|------------|-------------|----------------|------------|
| 3620 | 21ST CENTURY DEMOCRATS | C00230342 | BILL COMBS | 12/12/2018 | 6 | \$512,067 | 0 | 03/21/2019 | \$5,373 | 442 | \$5,373 |
| 3621 | AMERICA COMES FIRST PAC | C00623256 | DAVID W. SCHAMENS | | Not Filed | \$154,404 (est) | 5 | 03/21/2019 | \$17,986 | 442 | \$17,986 |
| 3627 | BORDER HEALTH FEDERAL PAC | C00415752 | ERNIE PEREZ | 01/31/2019 | Not Filed* | \$100,013 | 0 | 03/21/2019 | \$6,541 | 442 | \$6,541 |
| 3628 | BRAND NEW CONGRESS | C00613810 | AMY VILELA | 01/23/2019 | Not Filed* | \$79,173 | 0 | 03/21/2019 | \$5,086 | 442 | \$5,086 |
| 3629 | BROADER REPRESENTATION ADVOCACY TEAM - POLITICAL ACTION COMMITTEE | C00589200 | JASPER HENDRICKS III | 12/21/2018 | 15 | \$50,000 | 0 | 03/21/2019 | \$2,087 | 442 | NFA |
| 3630 | BUILD THE WAVE | C00667667 | NATHAN LERNER | 01/04/2019 | 29 | \$205,492 | 0 | 03/21/2019 | \$8,819 | 442 | \$8,819 |
| 3637 | GRASSROOTS AWARENESS PAC | C00618033 | PAM MATTSON | 03/29/2019 | Not Filed* | \$0 | 0 | 03/21/2019 | \$15,987 | 442 | NONE |
| 3640 | LIBERTY FOR US SUPER PAC | C00676429 | CHRIS MARSTON | 1/22/2020 | *Not Filed | \$903 | 0 | 03/21/2019 | \$5,086 | 442 | \$341 |
| 3642 | NEW NATION RISING | C00634964 | OLUFEMI OGUNNAIKE | | Not Filed | \$252,158 (est) | 0 | 03/21/2019 | \$11,627 | 442 | \$11,627 |
| 3646 | PIPEFITTERS LOCAL #533 VOLUNTEER POLITICAL FUND | C00206177 | CHARLES J. ROSEBURROUGH | 12/12/2018 | 6 | \$17,047 | 0 | 03/21/2019 | \$182 | 442 | \$182 |
| 3649 | RURAL PROGRESS | C00671040 | NATHANIEL IRVIN | | Not Filed | \$36,791 (est) | 0 | 03/21/2019 | \$1,230 | 442 | \$1,230 |

* The committee filed their report more than thirty (30) days after the due date; therefore, the report is considered not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|--|---|----------|
| In the Matter of |) | |
| |) | |
| Withdrawal and Resubmission of Final |) | |
| Determination Recommendation – 2018 30 |) | |
| Day Post-General Report (Unauthorized |) | |
| Filers) for the Administrative Fine Program: |) | |
| 21ST CENTURY DEMOCRATS, and |) | AF# 3620 |
| COMBS, BILL as treasurer; |) | |
| AMERICA COMES FIRST PAC, and |) | AF# 3621 |
| SCHAMENS, DAVID W MR. as treasurer; |) | |
| AMERICAN RENTAL ASSOCIATION |) | AF# 3623 |
| POLITICAL ACTION COMMITTEE, and |) | |
| MCCLELLAND, JOHN W. MR. as |) | |
| treasurer; |) | |
| ANDEAVOR LLC POLITICAL ACTION |) | AF# 3625 |
| COMMITTEE, and HUNT, TRAVIS J. as |) | |
| treasurer; |) | |
| BALDWIN WISCONSIN VICTORY |) | AF# 3626 |
| FUND, and CARLSON, GLENN as |) | |
| treasurer; |) | |
| BORDER HEALTH FEDERAL PAC, and |) | AF# 3627 |
| ERNIE PEREZ as treasurer; |) | |
| BRAND NEW CONGRESS, and VILELA, |) | AF# 3628 |
| AMY as treasurer; |) | |
| BUILD THE WAVE, and NATHAN |) | AF# 3630 |
| LERNER as treasurer; |) | |
| CAROLYN'S PAC, and MENDEZ, |) | AF# 3631 |
| MELISSA A. MS as treasurer; |) | |
| COMPTel PAC, and STROW, JULIA as |) | AF# 3632 |
| treasurer; |) | |
| CONNECTICUT DEMOCRATIC STATE |) | AF# 3633 |
| CENTRAL COMMITTEE, and |) | |
| MELLENDEZ, ELOISA as treasurer; |) | |
| CONSERVATIVE TRIUMPH FUND, and |) | AF# 3634 |
| RAMIREZ, RONALD as treasurer; |) | |
| D R I V E POLITICAL FUND CHAPTER |) | AF# 3635 |
| 886, and JERRY SIMS JR as treasurer; |) | |

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 Recommendation – 2018 30 Day Post-
 General Reports (Unauthorized Filers) for
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 June 29, 2020

| | |
|---|------------|
| KENTUCKY BANKERS POLITICAL ACTION COMMITTEE, and MATT VANCE as treasurer; | AF# 3638 |
| LIBERTY FOR US SUPER PAC, and |) AF# 3640 |
| MARSTON, CHRIS as treasurer; |) |
| NATIONAL TURKEY FEDERATION |) AF# 3641 |
| POLITICAL ACTION |) |
| COMMITTEE/TURPAC, and |) |
| BRANDENBERGER, JOEL as treasurer; |) |
| NEW NATION RISING, and |) AF# 3642 |
| OGUNNAIKE, OLUFEMI as treasurer; |) |
| NY19VOTES, and SAKAI, LINDA as treasurer; |) AF# 3643 |
| PIPEFITTERS LOCAL #533 |) AF# 3646 |
| VOLUNTEER POLITICAL FUND, and |) |
| ROSEBURROUGH, CHARLES J as treasurer; |) |
| RAND PAUL VICTORY, and |) AF# 3647 |
| BROGHAMER, KEVIN as treasurer; |) |
| ROCK CITY PAC, and KAEGI, |) AF# 3648 |
| KIMBERLY as treasurer; |) |
| RURAL PROGRESS, and IRVIN, |) AF# 3649 |
| NATHANIEL as treasurer; |) |
| SASSE LEADERSHIP COMMITTEE, and |) AF# 3650 |
| RALLS, STEVE as treasurer; |) |
| STATE OF HAWAII ORGANIZATION |) AF# 3651 |
| OF POLICE OFFICERS (SHOPO |) |
| POLITICAL ACTION FUND), and |) |
| SMITH, JAMES M MR. as treasurer; |) |
| STOP THE SPEAKER PAC, and |) AF# 3652 |
| LEVINSON, JEREMY as treasurer; |) |
| TEXAS PATRIOTS PAC, and GASKILL, |) AF# 3653 |
| CYNTHIA as treasurer; |) |
| THE FUND FOR AMERICAN |) AF# 3654 |
| EXCEPTIONALISM, and BONDERMAN, |) |
| REGAN MRS. as treasurer; |) |
| TOMORROW IS MEANINGFUL PAC, |) AF# 3656 |
| and WIGGINS, STACY as treasurer; |) |
| TTX PAC, and LOFTUS, PATRICK B as treasurer; |) AF# 3657 |
| |) |

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| | | |
|---------------------------------|---|----------|
| UGI CORPORATION POLITICAL |) | AF# 3658 |
| ACTION COMMITTEE(UGI/PAC), and |) | |
| PETTINE, DAVID as treasurer; |) | |
| ULTRA ELECTRONICS USA GROUP | | AF# 3659 |
| INC PAC (ULTRA ELECTRONICS USA | | |
| PAC OR UEUSA PAC), and MEYERS, | | |
| SCOTT A as treasurer; | | |
| YOUNG HOOSIER VICTORY FUND, and |) | AF# 3661 |
| BROGHAMER, KEVIN as treasurer; |) | |

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 30 Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated June 05, 2020 and subject to the Notice of Errata Memorandum dated June 17, 2020, on the following committees:

AF#3620 Decided by a vote of 4-0 to: (1) make a final determination that 21ST CENTURY DEMOCRATS, and COMBS, BILL 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#3621 Decided by a vote of 4-0 to: (1) make a final determination that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W 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.

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AF#3623 Decided by a vote of 4-0 to: (1) make a final determination that AMERICAN RENTAL ASSOCIATION POLITICAL ACTION COMMITTEE, and MCCLELLAND, JOHN W. 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#3625 Decided by a vote of 4-0 to: (1) make a final determination that ANDEAVOR LLC POLITICAL ACTION COMMITTEE, and HUNT, TRAVIS 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#3626 Decided by a vote of 4-0 to: (1) make a final determination that BALDWIN WISCONSIN VICTORY FUND, and CARLSON, GLENN 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#3627 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#3628 Decided by a vote of 4-0 to: (1) make a final determination that BRAND NEW CONGRESS, and VILELA, AMY 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#3630 Decided by a vote of 4-0 to: (1) make a final determination that BUILD THE WAVE, and NATHAN LERNER 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#3631 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)

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

AF#3632 Decided by a vote of 4-0 to: (1) make a final determination that COMPTTEL PAC, and STROW, JULIA 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#3633 Decided by a vote of 4-0 to: (1) make a final determination that CONNECTICUT DEMOCRATIC STATE CENTRAL COMMITTEE, and MELENDEZ, ELOISA 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#3634 Decided by a vote of 4-0 to: (1) make a final determination that CONSERVATIVE TRIUMPH FUND, and RAMIREZ, RONALD 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#3635 Decided by a vote of 4-0 to: (1) make a final determination that D R I V E POLITICAL FUND CHAPTER 886, and JERRY SIMS 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#3638 Decided by a vote of 4-0 to: (1) make a final determination that KENTUCKY BANKERS POLITICAL ACTION COMMITTEE, and MATT VANCE 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#3640 Decided by a vote of 4-0 to: (1) make a final determination that LIBERTY FOR US SUPER PAC, and MARSTON, CHRIS 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#3641 Decided by a vote of 4-0 to: (1) make a final determination that NATIONAL TURKEY FEDERATION POLITICAL ACTION COMMITTEE/TURPAC,

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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#3642 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#3643 Decided by a vote of 4-0 to: (1) make a final determination that NY19VOTES, and SAKAI, LINDA 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#3646 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#3647 Decided by a vote of 4-0 to: (1) make a final determination that RAND PAUL VICTORY, and BROGHAMER, 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#3648 Decided by a vote of 4-0 to: (1) make a final determination that ROCK CITY PAC, and KAEGI, KIMBERLY 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#3649 Decided by a vote of 4-0 to: (1) make a final determination that RURAL PROGRESS, and IRVIN, NATHANIEL 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#3650 Decided by a vote of 4-0 to: (1) make a final determination that SASSE LEADERSHIP COMMITTEE, and RALLS, STEVE 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#3651 Decided by a vote of 4-0 to: (1) make a final determination that STATE OF HAWAII ORGANIZATION OF POLICE OFFICERS (SHOPO POLITICAL ACTION FUND), and SMITH, JAMES M 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#3652 Decided by a vote of 4-0 to: (1) make a final determination that STOP THE SPEAKER PAC, and LEVINSON, JEREMY 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#3653 Decided by a vote of 4-0 to: (1) make a final determination that TEXAS PATRIOTS PAC, and GASKILL, CYNTHIA 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#3654 Decided by a vote of 4-0 to: (1) make a final determination that THE FUND FOR AMERICAN EXCEPTIONALISM, and BONDERMAN, REGAN MRS. 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#3656 Decided by a vote of 4-0 to: (1) make a final determination that TOMORROW IS MEANINGFUL PAC, and WIGGINS, STACY 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#3657 Decided by a vote of 4-0 to: (1) make a final determination that TTX PAC, and LOFTUS, PATRICK 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

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

AF#3658 Decided by a vote of 4-0 to: (1) make a final determination that UGI CORPORATION POLITICAL ACTION COMMITTEE(UGI/PAC), and PETTINE, 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#3659 Decided by a vote of 4-0 to: (1) make a final determination that ULTRA ELECTRONICS USA GROUP INC PAC (ULTRA ELECTRONICS USA PAC OR UEUSA PAC), and MEYERS, SCOTT 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#3661 Decided by a vote of 4-0 to: (1) make a final determination that YOUNG HOOSIER VICTORY FUND, and BROGHAMER, 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.



Attest:

**Laura
Sinram**

Laura E. Sinram
 Acting Secretary and Clerk of the
 Commission

Digitally signed by
 Laura Sinram
 Date: 2020.07.26
 20:08:41 -04'00'



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AF

August 7, 2020

Julia Strow, in official capacity as Treasurer
Comptel PAC
2025 M Street NW, Suite 800
Washington, DC 20036

C00344770

AF#: 3632

Dear Ms. Strow,

On March 21, 2019, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Comptel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2018 Post-General Report. By letter dated March 21, 2019, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$254 in accordance with the schedule of penalties at 11 CFR § 111.43.

On April 30, 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 Comptel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$254 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 Ben Holly on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

Sincerely,

A handwritten signature in black ink that reads "J.E. Trainor, III". The signature is fluid and cursive.

James E. "Trey" Trainor III
Chair

THIS IS THE END OF ADMINISTRATIVE FINE CASE #3632