

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #3640

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FEDERAL ELECTION COMMISSION  
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WASHINGTON, D.C. 20463

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	COMPTEL 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

3/19/2019 3:02 PM

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;	)
COMPTEL 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;	)

Federal Election Commission  
Certification for Administrative Fines  
March 21, 2019

Page 2

D R I V E POLITICAL FUND CHAPTER	)	AF# 3635
886, and TOM RITTER as treasurer;	)	
DEMOCRATS WORK FOR AMERICA,	)	AF# 3636
INC, and KAILAR, SUDHA as treasurer;	)	
GRASSROOTS AWARENESS PAC, and	)	AF# 3637
MATTSON, PAM as treasurer;	)	
KENTUCKY BANKERS POLITICAL	)	AF# 3638
ACTION COMMITTEE, and MATT	)	
VANCE as treasurer;	)	
LIBERTARIAN PARTY OF ILLINOIS,	)	AF# 3639
and DUNN, BRIAN W. as treasurer;	)	
LIBERTY FOR US SUPER PAC, and	)	AF# 3640
JOHNSON, BRAD 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	)	AF# 3643
treasurer;	)	
PEACE ACTION PAC/ FKA	)	AF# 3644
SANE/FREEZE PAC, and ROSALIE	)	
GREENE as treasurer;	)	
PIPEFITTERS LOCAL UNION #524, and	)	AF# 3645
DOLAN, PATRICK as treasurer;	)	
PIPEFITTERS LOCAL UNION #533	)	AF# 3646
VOLUNTEER POLITICAL FUND, and	)	
SCOTT FORBES 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 WILLIAM	)	AF# 3653
J. O'SULLIVAN, JR. as treasurer;	)	

Federal Election Commission  
Certification for Administrative Fines  
March 21, 2019

Page 3

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.

Federal Election Commission  
Certification for Administrative Fines  
March 21, 2019

Page 4

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.

Federal Election Commission  
Certification for Administrative Fines  
March 21, 2019

Page 5

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 COMPTEL 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.

Federal Election Commission  
Certification for Administrative Fines  
March 21, 2019

Page 6

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.

Federal Election Commission  
Certification for Administrative Fines  
March 21, 2019

Page 7

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.

Federal Election Commission  
Certification for Administrative Fines  
March 21, 2019

Page 8

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  
March 21, 2019

Page 9

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.

Federal Election Commission  
Certification for Administrative Fines  
March 21, 2019

Page 10

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.

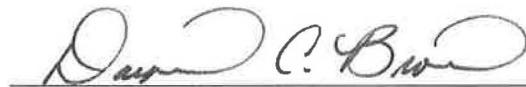
AF#3659 Decided by a vote of 4-0 to: (1) find reason to believe that ULTRA ELECTRONICS USA GROUP INC PAC (ULTRA ELECTRONICS USA PAC OR UEUSA PAC), and MEYERS, SCOTT A in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would 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



March 21, 2019

Brad Johnson, in official capacity as Treasurer  
 Liberty for Us Super PAC  
 4501 Ford Ave, Suite 713  
 Alexandria, VA 22302

C00676429  
 AF#: 3640

Dear Mr. Johnson:

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). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. 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 21, 2019, the FEC found that there is reason to believe ("RTB") that Liberty for Us Super 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 \$5,086. 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 \$5,086 is due within forty (40) days of the finding, or by April 30, 2019, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
 Level of Activity: \$85,260  
 Number of Days Late: Not Filed  
 Number of Previous Civil Money Penalties Assessed: 0

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

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

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

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). 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

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$5,086 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](http://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**

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FOR: Liberty for Us Super PAC

FEC ID#: C00676429

AF#: 3640

PAYMENT DUE DATE: April 30, 2019

PAYMENT AMOUNT DUE: \$5,086

**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: Kristin D. Roser/Ben Holly *KDR BH*  
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	COMPTEL 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	DRIVE 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 )  
MELENDEZ, 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; )

Federal Election Commission  
 Certification for Withdrawal and  
 Resubmission of Final Determination  
 Recommendation – 2018 30 Day Post-  
 General Reports (Unauthorized Filers) for  
 the Administrative Fines Program  
 June 29, 2020

Page 2

KENTUCKY BANKERS POLITICAL ACTION COMMITTEE, and MATT VANCE as treasurer;	AF# 3638
LIBERTY FOR US SUPER PAC, and MARSTON, CHRIS 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
PIPEFITTERS LOCAL #533 VOLUNTEER POLITICAL FUND, and ROSEBURROUGH, CHARLES J 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 GASKILL, CYNTHIA as treasurer;	) AF# 3653
THE FUND FOR AMERICAN EXCEPTIONALISM, and BONDERMAN, REGAN MRS. as treasurer;	) AF# 3654
TOMORROW IS MEANINGFUL PAC, and WIGGINS, STACY as treasurer;	) AF# 3656
TTX PAC, and LOFTUS, PATRICK B as treasurer;	) AF# 3657

Federal Election Commission  
 Certification for Withdrawal and  
 Resubmission of Final Determination  
 Recommendation – 2018 30 Day Post-  
 General Reports (Unauthorized Filers) for  
 the Administrative Fines Program  
 June 29, 2020

Page 3

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

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.

Federal Election Commission  
Certification for Withdrawal and  
Resubmission of Final Determination  
Recommendation – 2018 30 Day Post-  
General Reports (Unauthorized Filers) for  
the Administrative Fines Program  
June 29, 2020

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)

Federal Election Commission  
Certification for Withdrawal and  
Resubmission of Final Determination  
Recommendation – 2018 30 Day Post-  
General Reports (Unauthorized Filers) for  
the Administrative Fines Program  
June 29, 2020

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 COMPTEL 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,

Federal Election Commission  
Certification for Withdrawal and  
Resubmission of Final Determination  
Recommendation – 2018 30 Day Post-  
General Reports (Unauthorized Filers) for  
the Administrative Fines Program  
June 29, 2020

Page 6

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.

Federal Election Commission  
Certification for Withdrawal and  
Resubmission of Final Determination  
Recommendation – 2018 30 Day Post-  
General Reports (Unauthorized Filers) for  
the Administrative Fines Program  
June 29, 2020

Page 7

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#3655 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

Federal Election Commission  
 Certification for Withdrawal and  
 Resubmission of Final Determination  
 Recommendation – 2018 30 Day Post-  
 General Reports (Unauthorized Filers) for  
 the Administrative Fines Program  
 June 29, 2020

Page 8

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

Chris Marston, in official capacity as Treasurer  
Liberty for Us Super PAC  
P.O. Box 26141  
Alexandria, VA 22313

C00676429  
AF#: 3640

Dear Mr. Marston,

On March 21, 2019, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Liberty for Us Super 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 preliminary civil money penalty calculated at the RTB stage to be \$5,086 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, you were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. Since that time, the amount of the civil money penalty has been changed to reflect the actual level of activity of the Post-General Report. The FEC made a final determination on June 29, 2020 that Liberty for Us Super PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$341 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$903

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

Number of Previous Civil Money Penalties Assessed: 0

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

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

If you choose to appeal the final determination, you should submit a written petition, within thirty (30) days of receipt of this letter, to the U.S. District Court for the

## LIBERTY FOR US SUPER PAC

Page 2 of 4

district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

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

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 et seq. If you do not pay this debt within thirty (30) days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within five (5) days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

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

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

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

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

LIBERTY FOR US SUPER PAC

Page 3 of 4

#### **4. Partial Payments**

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

#### **5. Settlement Offers**

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

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

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

Sincerely,



James E. "Trey" Trainor III  
Chair

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#### **ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$341 for the 2018 Post-General Report. The payment is due within 30 days of receipt of this letter.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online

LIBERTY FOR US SUPER PAC

Page 4 of 4

collections. Visit [www.fec.gov/af/pay.shtml](http://www.fec.gov/af/pay.shtml) to be directed to Pay.gov's Administrative Fine Program Payment form. Please use the details below to complete the required fields. For additional payment options, 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.

COMMITTEE NAME: Liberty for Us Super PAC

FEC ID#: C00676429

AF#: 3640

PAYMENT AMOUNT DUE: \$341

THIS IS THE END OF ADMINISTRATIVE FINE CASE #3640