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THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #3711



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

April 2, 2019

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP by BAH*

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Reason To Believe Recommendation – 2018 Year-End Report for the  
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2018 Year-End Report in accordance with 52 U.S.C. § 30104(a). The Year-End Report was due on January 31, 2019.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after 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 the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

In order to determine the level of activity for unauthorized quarterly filers that filed a Year-End Report and were required to but failed to file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- 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 30 Day Post-General Report (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 YE fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a YE that covered the period from November 27, 2018 through December 31, 2018 (35 days). 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 38.04% (35 days (correct YE Filing Period)/92 days (submitted 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 YE.

### **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 YEAR-END Not Election Sensitive 01/31/2019 H\_S\_P\_UNAUTH

| AF#  | Committee ID | Committee Name                                                             | Candidate Name         | Treasurer              | Threshold   | PV | Receipt Date | Days Late       | LOA             | RTB Penalty |
|------|--------------|----------------------------------------------------------------------------|------------------------|------------------------|-------------|----|--------------|-----------------|-----------------|-------------|
| 3662 | C00637462    | ALLISON FOR CONGRESS                                                       | ALLISON GALBRAITH      | ALLISON GALBRAITH      | \$224,189   | 0  |              | Not Filed       | \$28,024 (est)  | \$1,230     |
| 3663 | C00623256    | AMERICA COMES FIRST PAC                                                    |                        | DAVID W. SCHAMENS      | \$154,404   | 5  |              | Not Filed       | \$154,404 (est) | \$17,986    |
| 3664 | C00324780    | AMERICAN ACADEMY OF EMERGENCY MEDICINE POLITICAL ACTION COMMITTEE AAEM PAC |                        | WILLIAM T. DURKIN, JR. | \$120,046   | 0  | 2/6/2019     | 6               | \$10,921        | \$182       |
| 3665 | C00658757    | AMERICANS SUPPORTING VETERANS PAC                                          |                        | MARK SLY               | \$695,765   | 0  | 3/29/2019    | 57 (Not Filed*) | \$119,609       | \$6,541     |
| 3666 | C00638692    | ANDREW TAKAMI FOR US SENATE                                                | ANDREW BENJAMIN TAKAMI | RONALD F. BARNES       | \$332,746   | 0  | 3/26/2019    | 54 (Not Filed*) | \$298           | \$298       |
| 3667 | C00216184    | ANESTHESIA SERVICE MEDICAL GROUP ADVOCACY FUND                             |                        | C. APRIL BOLING        | \$117,891   | 0  | 2/11/2019    | 11              | \$3,423         | \$101       |
| 3668 | C00639427    | ARUNA MILLER FOR CONGRESS                                                  | ARUNA MILLER           | SUDHIR SEKHSARIA       | \$2,934,505 | 0  |              | Not Filed       | \$419,215 (est) | \$13,080    |
| 3669 | C00673459    | BARIA FOR MISSISSIPPI                                                      | DAVID WAYNE BARIA      | WILL GODFREY           | \$1,483,988 | 0  |              | Not Filed       | \$247,331 (est) | \$9,446     |
| 3670 | C00636175    | BILLY KOVACS FOR CONGRESS                                                  | WILLIAM RICHARD KOVACS | BILLY KOVACS           | \$144,244   | 0  |              | Not Filed       | \$20,606 (est)  | \$684       |
| 3671 | C00661413    | BOPHA MALONE FOR CONGRESS                                                  | BOPHA MALONE           | JOSH ASLANIAN          | \$150,805   | 0  | 4/1/2019     | 60 (Not Filed*) | \$3,563         | \$341       |
| 3672 | C00652321    | CARRIGAN FOR CONGRESS                                                      | SEAN J. CARRIGAN       | KADENIA JAVIS          | \$303,162   | 0  |              | Not Filed       | \$50,527 (est)  | \$3,925     |
| 3673 | C00667279    | COMMITTEE TO ELECT ENOCH                                                   | VANESSA L. ENOCH       | CATHERINE JOHNSON      | \$116,150   | 0  |              | Not Filed       | \$19,358 (est)  | \$684       |
| 3674 | C00663104    | COMMITTEE TO ELECT HP                                                      | HAMID PARVIZIAN        | DOUNIA METOURI         | \$213,822   | 0  |              | Not Filed       | \$106,911 (est) | \$6,541     |
| 3676 | C00663435    | COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS                             | MAURO EVERETT GARZA    | BERNARDINO RODRIGUEZ   | \$267,918   | 0  | 3/5/2019     | 33 (Not Filed*) | \$206           | \$206       |
| 3677 | C00516922    | COMMITTEE TO ELECT RON VARASTEY                                            | RON VARASTEY           | MASHA MACURDA          | \$504,325   | 0  |              | Not Filed       | \$56,036 (est)  | \$3,925     |
| 3679 | C00634885    | DALE KERNS FOR OFFICE                                                      | DALE RONALD KERNS JR.  | JOSEPH P. SOLOSKI      | \$403,511   | 0  |              | Not Filed       | \$50,439 (est)  | \$3,925     |
| 3680 | C00665364    | DEAGLAN MCEACHERN FOR CONGRESS                                             | DEAGLAN MCEACHERN      | LORI TIERNAN           | \$534,471   | 0  |              | Not Filed       | \$133,618 (est) | \$6,541     |
| 3681 | C00630798    | DOROTHY GASQUE FOR CONGRESS                                                | DOROTHY GASQUE         | MEGAN JONES            | \$134,065   | 0  |              | Not Filed       | \$19,152 (est)  | \$684       |
| 3682 | C00641340    | ERIC FOR US                                                                | ERIC HOLGUIN           | ELIZABETH PEREZ        | \$401,267   | 0  | 3/18/2019    | 46 (Not Filed*) | \$1,753         | \$341       |
| 3683 | C00650929    | ETHAN PHAM FOR CONGRESS                                                    | ETHAN PHAM             | JENNY NGUYEN           | \$899,086   | 0  |              | Not Filed       | \$179,817 (est) | \$7,994     |
| 3684 | C00377168    | FEMINIST MAJORITY PAC                                                      |                        | PEG YORKIN             | \$121,047   | 0  | 2/13/2019    | 13              | \$1,207         | \$113       |
| 3685 | C00610022    | FINANCE COMMITTEE FOR DOUGLAS HOWARD PIERCE                                | DOUGLAS HOWARD PIERCE  | DOUGLAS HOWARD PIERCE  | \$192,800   | 0  |              | Not Filed       | \$32,133 (est)  | \$1,230     |

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| AF#  | Committee ID | Committee Name                                 | Candidate Name           | Treasurer               | Threshold   | PV | Receipt Date | Days Late | LOA               | RTB Penalty |
|------|--------------|------------------------------------------------|--------------------------|-------------------------|-------------|----|--------------|-----------|-------------------|-------------|
| 3686 | C00638536    | FRIENDS OF DANNER KLINE                        | DANNER KLINE             | WILLIAM DAVIS           | \$574,864   | 0  |              | Not Filed | \$63,874 (est)    | \$3,925     |
| 3687 | C00670992    | FRIENDS OF DAVID WERTIME                       | DAVID WERTIME            | RICHARD WERTIME         | \$250,085   | 0  | 2/25/2019    | 25        | \$2,488           | \$185       |
| 3688 | C00630434    | FRIENDS OF EDWIN SANTANA JR. FOR CONGRESS      | EDWIN SANTANA JR.        | TRACY LEE SANTANA       | \$117,759   | 0  |              | Not Filed | \$19,627 (est)    | \$684       |
| 3689 | C00400317    | FULTON FINANCIAL CORPORATION PAC               |                          | MICHAEL J. DEPORTER     | \$229,548   | 0  |              | Not Filed | \$28,694 (est)    | \$1,230     |
| 3690 | C00656744    | GEORGE FRANKLIN FOR CONGRESS                   | GEORGE FRANKLIN          | HEATHER RICKETTS        | \$1,687,482 | 0  |              | Not Filed | \$337,496 (est)   | \$11,627    |
| 3691 | C00634048    | GREG PILKINGTON FOR CONGRESS                   | JAMES GREGORY PILKINGTON | PHYLLIS WHITNEY         | \$127,983   | 0  |              | Not Filed | \$21,331 (est)    | \$684       |
| 3692 | C00664086    | HART 2020                                      | HART P. CUNNINGHAM       | HART C. CUNNINGHAM      | \$677,345   | 0  |              | Not Filed | \$225,782 (est)   | \$9,446     |
| 3693 | C00492157    | INSPIRE BRANDS INC. POLITICAL ACTION COMMITTEE |                          | DANTON NOLAN            | \$177,978   | 0  | 2/13/2019    | 13        | \$594             | \$113       |
| 3694 | C00660977    | JASON NICHOLS FOR CONGRESS                     | JASON NICHOLS            | JASON NICHOLS           | \$266,815   | 0  | 2/19/2019    | 19        | \$1,536           | \$149       |
| 3695 | C00677872    | JONATHAN JENKINS FOR SENATE COMMITTEE          | JONATHAN JENKINS         | CHRIS EHLINGER          | \$1,049,103 | 0  |              | Not Filed | \$1,049,103 (est) | \$17,440    |
| 3696 | C00678557    | LAKE FOR CONGRESS                              | JEANNINE LEE LAKE        | JESSE NAHSHON PRATER    | \$132,721   | 0  |              | Not Filed | \$44,240 (est)    | \$1,230     |
| 3697 | C00622910    | LIBERTY T                                      |                          | SAMUEL B. CASEY         | \$170,690   | 0  |              | Not Filed | \$24,384 (est)    | \$684       |
| 3698 | C00665372    | MALARSIE HOUSE RUN 2018                        | MARY MALARSIE            | TERRY BLEVINS           | \$217,111   | 0  |              | Not Filed | \$43,422 (est)    | \$1,230     |
| 3699 | C00664516    | MARTY GEARHEART FOR CONGRESS                   | MARTY GEARHEART          | NISHANT GROVER          | \$182,662   | 0  |              | Not Filed | \$60,887 (est)    | \$3,925     |
| 3700 | C00634964    | NEW NATION RISING                              |                          | OLUFEMI OGUNNAIKE       | \$1,512,947 | 0  |              | Not Filed | \$252,158 (est)   | \$11,627    |
| 3701 | C00657189    | PEOPLE FOR CORBIN-JOHNSON                      | SHAVONNIA CORBIN-JOHNSON | JOSEPH BACHMAN          | \$480,628   | 0  |              | Not Filed | \$96,126 (est)    | \$5,086     |
| 3702 | C00192849    | PLUMBERS AND PIPEFITTERS LOCAL UNION 74        |                          | MICHAEL B. HACKENDORN   | \$283,458   | 2  |              | Not Filed | \$40,494 (est)    | \$1,845     |
| 3703 | C00647560    | REUBEN FOR CONGRESS                            | REUBEN D'SILVA           | BREON KING              | \$117,681   | 0  |              | Not Filed | \$39,226 (est)    | \$1,230     |
| 3704 | C00661256    | ROEL GARCIA FOR CONGRESS                       | ROEL GARCIA              | ROCIO GARCIA            | \$102,778   | 0  |              | Not Filed | \$25,695 (est)    | \$1,230     |
| 3705 | C00640755    | ROZA CALDERON FOR CONGRESS 2018                | ROZA I. CALDERON         | MICHAEL WILLIAMS        | \$129,499   | 1  |              | Not Filed | \$32,375 (est)    | \$1,537     |
| 3706 | C00671040    | RURAL PROGRESS                                 |                          | NATHANIEL IRVIN         | \$110,372   | 0  |              | Not Filed | \$36,791 (est)    | \$1,230     |
| 3707 | C00661181    | SAM DEEN FOR CONGRESS                          | SAM ALAN DEEN,           | TERI LYNN PRUITT        | \$159,926   | 0  |              | Not Filed | \$31,985 (est)    | \$1,230     |
| 3708 | C00640151    | SARAH SMITH 2018                               | SARAH SMITH              | ANDY LO                 | \$238,279   | 0  |              | Not Filed | \$26,475 (est)    | \$1,230     |
| 3709 | C00659326    | SHAYANI FOR CONGRESS 2018                      | PAYAM MARK SHAYANI       | SHAROKIN VARDEH-DARIUSH | \$225,842   | 0  |              | Not Filed | \$56,461 (est)    | \$3,925     |

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| AF#  | Committee ID | Committee Name              | Candidate Name       | Treasurer                | Threshold | PV | Receipt Date | Days Late       | LOA             | RTB Penalty |
|------|--------------|-----------------------------|----------------------|--------------------------|-----------|----|--------------|-----------------|-----------------|-------------|
| 3710 | C00649947    | SOLOMON FOR CONGRESS        | ROBERT SOLOMON       | ROBERT CHARLES SOLOMON   | \$560,780 | 0  |              | Not Filed       | \$112,156 (est) | \$6,541     |
| 3711 | C00641571    | TEXANS FOR TEXAS            |                      | DAVID TERRY              | \$697,929 | 0  | 3/18/2019    | 46 (Not Filed*) | \$384           | \$341       |
| 3712 | C00626564    | THE SEASONAL EMPLOYER PAC   |                      | ELIZABETH WHITLEY        | \$112,629 | 0  | 2/8/2019     | 8               | \$5,136         | \$116       |
| 3713 | C00626671    | THE UTE PAC                 |                      | ROBERT GEORGE LUCERO JR. | \$231,041 | 0  | 3/7/2019     | 35 (Not Filed*) | \$145           | \$145       |
| 3714 | C00674978    | THOMAS FOR FIRST            | THOMAS RUDBECK       | THOMAS RUDBECK           | \$496,144 | 0  |              | Not Filed       | \$124,036 (est) | \$6,541     |
| 3715 | C00678300    | TIM AALDERS FOR US SENATE   | TIMOTHY NOEL AALDERS | TIM AALDERS              | \$212,994 | 0  |              | Not Filed       | \$53,249 (est)  | \$3,925     |
| 3716 | C00649368    | TIM RICH FOR CONGRESS       | TIMOTHY A. RICH      | TIMOTHY A. RICH          | \$136,614 | 0  |              | Not Filed       | \$45,538 (est)  | \$1,230     |
| 3717 | C00629881    | TO ELECT JENNY MARSHALL     | JENNIFER MARSHALL    | JENNIFER MARSHALL        | \$259,528 | 0  |              | Not Filed       | \$37,075 (est)  | \$1,230     |
| 3718 | C00433672    | TRANSYSTEMS CORPORATION PAC |                      | PAUL J. MALIR            | \$140,196 | 0  | 2/22/2019    | 22              | \$12,591        | \$278       |
| 3719 | C00683813    | WE ARE GREAT AGAIN PAC      |                      | RYAN NEWSOME             | \$509,132 | 0  | 2/22/2019    | 22              | \$132,207       | \$4,875     |

\* 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 | ) |          |
| Year-End Report for the Administrative  | ) |          |
| Fine Program:                           | ) |          |
| ALLISON FOR CONGRESS, and               | ) | AF# 3662 |
| ALLISON GALBRAITH as treasurer;         | ) |          |
| AMERICA COMES FIRST PAC, and            | ) | AF# 3663 |
| SCHAMENS, DAVID W MR. as treasurer;     | ) |          |
| AMERICAN ACADEMY OF                     | ) | AF# 3664 |
| EMERGENCY MEDICINE POLITICAL            | ) |          |
| ACTION COMMITTEE AAEM PAC, and          | ) |          |
| DR. WILLIAM T DURKIN, JR as             | ) |          |
| treasurer;                              | ) |          |
| AMERICANS SUPPORTING VETERANS           | ) | AF# 3665 |
| PAC, and SLY, MARK as treasurer;        | ) |          |
| ANDREW TAKAMI FOR US SENATE,            | ) | AF# 3666 |
| and RONALD F BARNES CPA/PFS as          | ) |          |
| treasurer;                              | ) |          |
| ANESTHESIA SERVICE MEDICAL              | ) | AF# 3667 |
| GROUP ADVOCACY FUND, and C              | ) |          |
| APRIL BOLING as treasurer;              | ) |          |
| ARUNA MILLER FOR CONGRESS, and          | ) | AF# 3668 |
| SEKHSARIA, SUDHIR MD as treasurer;      | ) |          |
| BARIA FOR MISSISSIPPI, and              | ) | AF# 3669 |
| GODFREY, WILL as treasurer;             | ) |          |
| BILLY KOVACS FOR CONGRESS, and          | ) | AF# 3670 |
| KOVACS, BILLY as treasurer;             | ) |          |
| BOPHA MALONE FOR CONGRESS, and          | ) | AF# 3671 |
| ASLANIAN, JOSH MR. as treasurer;        | ) |          |
| CARRIGAN FOR CONGRESS, and              | ) | AF# 3672 |
| JAVIS, KADENIA as treasurer;            | ) |          |
| COMMITTEE TO ELECT ENOCH, and           | ) | AF# 3673 |
| JOHNSON, CATHERINE as treasurer;        | ) |          |
| COMMITTEE TO ELECT HP, and              | ) | AF# 3674 |
| METOURI, DOUNIA as treasurer;           | ) |          |

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|                                                                                                      |            |
|------------------------------------------------------------------------------------------------------|------------|
| COMMITTEE TO ELECT MAURO<br>GARZA FOR US CONGRESS, and<br>RODRIGUEZ, BERNARDINO MR. as<br>treasurer; | AF# 3676   |
| COMMITTEE TO ELECT RON<br>VARASTEH, and MACURDA, MASHA as<br>treasurer;                              | ) AF# 3677 |
| DALE KERNS FOR OFFICE, and JOSEPH<br>P SOLOSKI as treasurer;                                         | ) AF# 3679 |
| DEAGLAN MCEACHERN FOR<br>CONGRESS, and TIERNAN, LORI as<br>treasurer;                                | ) AF# 3680 |
| DOROTHY GASQUE FOR CONGRESS,<br>and JONES, MEGAN as treasurer;                                       | ) AF# 3681 |
| ERIC FOR US, and PEREZ, ELIZABETH<br>as treasurer;                                                   | ) AF# 3682 |
| ETHAN PHAM FOR CONGRESS, and<br>NGUYEN, JENNY as treasurer;                                          | ) AF# 3683 |
| FEMINIST MAJORITY PAC, and PEG<br>YORKIN as treasurer;                                               | ) AF# 3684 |
| FINANCE COMMITTEE FOR DOUGLAS<br>HOWARD PIERCE, and DOUGLAS<br>HOWARD PIERCE as treasurer;           | ) AF# 3685 |
| FRIENDS OF DANNER KLINE, and<br>DAVIS, WILLIAM as treasurer;                                         | ) AF# 3686 |
| FRIENDS OF DAVID WERTIME, and<br>WERTIME, RICHARD as treasurer;                                      | ) AF# 3687 |
| FRIENDS OF EDWIN SANTANA JR.<br>FOR CONGRESS, and SANTANA,<br>TRACY LEE as treasurer;                | ) AF# 3688 |
| FULTON FINANCIAL CORPORATION<br>PAC, and MICHAEL J DEPORTER as<br>treasurer;                         | ) AF# 3689 |
| GEORGE FRANKLIN FOR CONGRESS,<br>and RICKETTS, HEATHER as treasurer;                                 | ) AF# 3690 |
| GREG PILKINGTON FOR CONGRESS,<br>and WHITNEY, PHYLLIS as treasurer;                                  | ) AF# 3691 |
| HART 2020, and CUNNINGHAM, HART<br>C. as treasurer;                                                  | ) AF# 3692 |
| INSPIRE BRANDS INC. POLITICAL<br>ACTION COMMITTEE, and NOLAN,<br>DANTON as treasurer;                | ) AF# 3693 |
| JASON NICHOLS FOR CONGRESS, and<br>NICHOLS, JASON as treasurer;                                      | ) AF# 3694 |

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|                                   |   |          |
|-----------------------------------|---|----------|
| JONATHAN JENKINS FOR SENATE       | ) | AF# 3695 |
| COMMITTEE, and CHRIS EHLINGER as  | ) |          |
| treasurer;                        | ) |          |
| LAKE FOR CONGRESS, and PRATER,    | ) | AF# 3696 |
| NAHSHON JESSE MR. as treasurer;   | ) |          |
|                                   | ) |          |
|                                   | ) |          |
|                                   | ) |          |
| LIBERTY T, and CASEY, SAMUEL B as | ) | AF# 3697 |
| treasurer;                        | ) |          |
| MALARSIE HOUSE RUN 2018, and      | ) | AF# 3698 |
| BLEVINS, TERRY as treasurer;      | ) |          |
| MARTY GEARHEART FOR CONGRESS,     | ) | AF# 3699 |
| and GROVER, NISHANT as treasurer; | ) |          |
| NEW NATION RISING, and            | ) | AF# 3700 |
| OGUNNAIKE, OLUFEMI as treasurer;  | ) |          |
| PEOPLE FOR CORBIN-JOHNSON, and    | ) | AF# 3701 |
| BACHMAN, JOSEPH as treasurer;     | ) |          |
| PLUMBERS AND PIPEFITTERS LOCAL    | ) | AF# 3702 |
| UNION 74, and HACKENDORN,         | ) |          |
| MICHAEL B as treasurer;           | ) |          |
| REUBEN FOR CONGRESS, and KING,    | ) | AF# 3703 |
| BREON as treasurer;               | ) |          |
| ROEL GARCIA FOR CONGRESS, and     | ) | AF# 3704 |
| GARCIA, ROCIO as treasurer;       | ) |          |
| ROZA CALDERON FOR CONGRESS        | ) | AF# 3705 |
| 2018, and WILIAMS, MICHAEL as     | ) |          |
| treasurer;                        | ) |          |
| RURAL PROGRESS, and IRVIN,        | ) | AF# 3706 |
| NATHANIEL as treasurer;           | ) |          |
| SAM DEEN FOR CONGRESS, and        | ) | AF# 3707 |
| PRUITT, TERI LYNN as treasurer;   | ) |          |
| SARAH SMITH 2018, and LO, ANDY as | ) | AF# 3708 |
| treasurer;                        | ) |          |
| SHAYANI FOR CONGRESS 2018, and    | ) | AF# 3709 |
| VARDEH-DARIUSH, SHAROKIN as       | ) |          |
| treasurer;                        | ) |          |
| SOLOMON FOR CONGRESS, and         | ) | AF# 3710 |
| SOLOMON, ROBERT CHARLES DR. as    | ) |          |
| treasurer;                        | ) |          |
| TEXANS FOR TEXAS, and TERRY,      | ) | AF# 3711 |
| DAVID as treasurer;               | ) |          |
| THE SEASONAL EMPLOYER PAC, and    | ) | AF# 3712 |
| ELIZABETH WHITLEY as treasurer;   | ) |          |

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|                                  |   |          |
|----------------------------------|---|----------|
| THE UTE PAC, and LUCERO, ROBERT  | ) | AF# 3713 |
| GEORGE MR JR as treasurer;       | ) |          |
| THOMAS FOR FIRST, and RUDBECK,   | ) | AF# 3714 |
| THOMAS as treasurer;             | ) |          |
| TIM AALDERS FOR US SENATE, and   | ) | AF# 3715 |
| AALDERS, TIM as treasurer;       | ) |          |
| TIM RICH FOR CONGRESS, and RICH, | ) | AF# 3716 |
| TIMOTHY A as treasurer;          | ) |          |
| TO ELECT JENNY MARSHALL, and     | ) | AF# 3717 |
| MARSHALL, JENNIFER as treasurer; | ) |          |
| TRANSYSTEMS CORPORATION PAC,     | ) | AF# 3718 |
| and PAUL J MALIR as treasurer;   | ) |          |
| WE ARE GREAT AGAIN PAC, and      | ) | AF# 3719 |
| NEWSOME, RYAN as treasurer;      | ) |          |

CERTIFICATION

I, Laura E. Sinram, Deputy Secretary of the Federal Election Commission, do hereby certify that on April 05, 2019 the Commission took the following actions on the Reason To Believe Recommendation - 2018 Year-End Report for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated April 02, 2019, on the following committees:

AF#3662 Decided by a vote of 4-0 to: (1) find reason to believe that ALLISON FOR CONGRESS, and ALLISON GALBRAITH 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#3663 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.

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AF#3664 Decided by a vote of 4-0 to: (1) find reason to believe that AMERICAN ACADEMY OF EMERGENCY MEDICINE POLITICAL ACTION COMMITTEE AAEM PAC, and DR. WILLIAM T DURKIN, 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#3665 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#3666 Decided by a vote of 4-0 to: (1) find reason to believe that ANDREW TAKAMI FOR US SENATE, and RONALD F BARNES CPA/PFS 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#3667 Decided by a vote of 4-0 to: (1) find reason to believe that ANESTHESIA SERVICE MEDICAL GROUP ADVOCACY FUND, and C APRIL BOLING 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#3668 Decided by a vote of 4-0 to: (1) find reason to believe that ARUNA MILLER FOR CONGRESS, and SEKHSARIA, SUDHIR MD 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#3669 Decided by a vote of 4-0 to: (1) find reason to believe that BARIA FOR MISSISSIPPI, and GODFREY, WILL 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#3670 Decided by a vote of 4-0 to: (1) find reason to believe that BILLY KOVACS FOR CONGRESS, and KOVACS, BILLY in his official capacity as treasurer

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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#3671 Decided by a vote of 4-0 to: (1) find reason to believe that BOPHA MALONE FOR CONGRESS, and ASLANIAN, JOSH 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#3672 Decided by a vote of 4-0 to: (1) find reason to believe that CARRIGAN FOR CONGRESS, and JAVIS, KADENIA 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#3673 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT ENOCH, and JOHNSON, CATHERINE 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#3674 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT HP, and METOURI, DOUNIA 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#3676 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS, and RODRIGUEZ, BERNARDINO 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#3677 Decided by a vote of 4-0 to: (1) find reason to believe that COMMITTEE TO ELECT RON VARASTEH, and MACURDA, MASHA 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

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

AF#3679 Decided by a vote of 4-0 to: (1) find reason to believe that DALE KERNS FOR OFFICE, and JOSEPH P SOLOSKI 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#3680 Decided by a vote of 4-0 to: (1) find reason to believe that DEAGLAN MCEACHERN FOR CONGRESS, and TIERNAN, LORI 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#3681 Decided by a vote of 4-0 to: (1) find reason to believe that DOROTHY GASQUE FOR CONGRESS, and JONES, MEGAN 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#3682 Decided by a vote of 4-0 to: (1) find reason to believe that ERIC FOR US, and PEREZ, ELIZABETH 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#3683 Decided by a vote of 4-0 to: (1) find reason to believe that ETHAN PHAM FOR CONGRESS, and NGUYEN, JENNY 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#3684 Decided by a vote of 4-0 to: (1) find reason to believe that FEMINIST MAJORITY PAC, and PEG YORKIN 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#3685 Decided by a vote of 4-0 to: (1) find reason to believe that FINANCE COMMITTEE FOR DOUGLAS HOWARD PIERCE, and DOUGLAS HOWARD PIERCE 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#3686 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF DANNER KLINE, and DAVIS, WILLIAM 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#3687 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF DAVID WERTIME, and WERTIME, RICHARD 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#3688 Decided by a vote of 4-0 to: (1) find reason to believe that FRIENDS OF EDWIN SANTANA JR. FOR CONGRESS, and SANTANA, TRACY LEE 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#3689 Decided by a vote of 4-0 to: (1) find reason to believe that FULTON FINANCIAL CORPORATION PAC, and MICHAEL J DEPORTER 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#3690 Decided by a vote of 4-0 to: (1) find reason to believe that GEORGE FRANKLIN FOR CONGRESS, and RICKETTS, HEATHER 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#3691 Decided by a vote of 4-0 to: (1) find reason to believe that GREG PILKINGTON FOR CONGRESS, and WHITNEY, PHYLLIS 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#3692 Decided by a vote of 4-0 to: (1) find reason to believe that HART 2020, and CUNNINGHAM, HART C. 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#3693 Decided by a vote of 4-0 to: (1) find reason to believe that INSPIRE BRANDS INC. POLITICAL ACTION COMMITTEE, and NOLAN, DANTON 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#3694 Decided by a vote of 4-0 to: (1) find reason to believe that JASON NICHOLS FOR CONGRESS, and NICHOLS, JASON 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#3695 Decided by a vote of 4-0 to: (1) find reason to believe that JONATHAN JENKINS FOR SENATE COMMITTEE, and CHRIS EHLINGER 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#3696 Decided by a vote of 4-0 to: (1) find reason to believe that LAKE FOR CONGRESS, and PRATER, NAHSHON JESSE 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#3697 Decided by a vote of 4-0 to: (1) find reason to believe that LIBERTY T, and CASEY, SAMUEL B 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#3698 Decided by a vote of 4-0 to: (1) find reason to believe that MALARSIE HOUSE RUN 2018, and BLEVINS, TERRY 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#3699 Decided by a vote of 4-0 to: (1) find reason to believe that MARTY GEARHEART FOR CONGRESS, and GROVER, NISHANT 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#3700 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#3701 Decided by a vote of 4-0 to: (1) find reason to believe that PEOPLE FOR CORBIN-JOHNSON, and BACHMAN, JOSEPH in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3702 Decided by a vote of 4-0 to: (1) find reason to believe that PLUMBERS AND PIPEFITTERS LOCAL UNION 74, and HACKENDORN, MICHAEL B 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#3703 Decided by a vote of 4-0 to: (1) find reason to believe that REUBEN FOR CONGRESS, and KING, BREON 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#3704 Decided by a vote of 4-0 to: (1) find reason to believe that ROEL GARCIA FOR CONGRESS, and GARCIA, ROCIO 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.

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

AF#3705 Decided by a vote of 4-0 to: (1) find reason to believe that ROZA CALDERON FOR CONGRESS 2018, and WILLIAMS, 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#3706 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#3707 Decided by a vote of 4-0 to: (1) find reason to believe that SAM DEEN FOR CONGRESS, and PRUITT, TERI LYNN 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#3708 Decided by a vote of 4-0 to: (1) find reason to believe that SARAH SMITH 2018, and LO, ANDY 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#3709 Decided by a vote of 4-0 to: (1) find reason to believe that SHAYANI FOR CONGRESS 2018, and VARDEH-DARIUSH, SHAROKIN 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#3710 Decided by a vote of 4-0 to: (1) find reason to believe that SOLOMON FOR CONGRESS, and SOLOMON, ROBERT CHARLES DR. 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#3711 Decided by a vote of 4-0 to: (1) find reason to believe that TEXANS FOR TEXAS, and TERRY, DAVID in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3712 Decided by a vote of 4-0 to: (1) find reason to believe that THE SEASONAL EMPLOYER PAC, and ELIZABETH WHITLEY 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#3713 Decided by a vote of 4-0 to: (1) find reason to believe that THE UTE PAC, and LUCERO, ROBERT GEORGE MR 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#3714 Decided by a vote of 4-0 to: (1) find reason to believe that THOMAS FOR FIRST, and RUDBECK, THOMAS 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#3715 Decided by a vote of 4-0 to: (1) find reason to believe that TIM AALDERS FOR US SENATE, and AALDERS, TIM 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#3716 Decided by a vote of 4-0 to: (1) find reason to believe that TIM RICH FOR CONGRESS, and RICH, TIMOTHY 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#3717 Decided by a vote of 4-0 to: (1) find reason to believe that TO ELECT JENNY MARSHALL, and MARSHALL, JENNIFER 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.

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

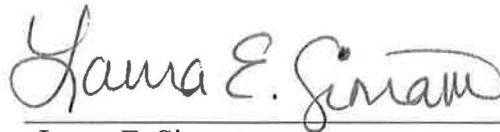
AF#3718 Decided by a vote of 4-0 to: (1) find reason to believe that TRANSYSTEMS CORPORATION PAC, and PAUL J MALIR in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3719 Decided by a vote of 4-0 to: (1) find reason to believe that WE ARE GREAT AGAIN PAC, and NEWSOME, RYAN 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:

4/5/19

Date



Laura E. Sinram

Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 8, 2019

David Terry, in official capacity as Treasurer  
Texans for Texas  
P.O. Box 34494  
Fort Worth, TX 76162

C00641571  
AF#: 3711

Dear Mr. Terry:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year-End Report of Receipts and Disbursements every calendar year. This report, covering the period November 27, 2018 through December 31, 2018, shall be filed no later than January 31, 2019. 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 this 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 April 5, 2019, the FEC found that there is reason to believe ("RTB") that Texans for Texas 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 January 31, 2019. 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 \$341. 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 \$341 is due within forty (40) days of the finding, or by May 15, 2019, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$384

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

Number of Previous Civil Money Penalties Assessed: 0

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

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

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 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 May 15, 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 Texans for Texas 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

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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 \$341 for the 2018 Year-End 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: Texans for Texas

FEC ID#: C00641571

AF#: 3711

PAYMENT DUE DATE: May 15, 2019

PAYMENT AMOUNT DUE: \$341

**RECEIVED**

By Office of the Commission Secretary at 11:02 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* Kristin D. Roser/Ben Holly *BH*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Withdrawal and Resubmission of Final Determination Recommendation – 2018 Year-End Report for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on November 26, 2019 in order to reflect updates disclosed in filings received by the Commission after the initial submission of this recommendation. On February 5, 2020, Allison for Congress (AF 3662) filed a 2018 Year-End Report that disclosed no activity for the 2018 Year-End reporting period. Also on February 5, 2020, Lake for Congress (AF 3696) filed a 2018 Year-End Report that disclosed a level of activity lower than previously estimated. On November 26, 2019, Liberty T (AF 3697) filed a complete 2018 Year-End Report that disclosed no activity for the 2018 Year-End reporting period. The circulation chart has been updated to reflect the level of activity and final civil money penalty amounts disclosed on the most recent filings for the above mentioned committees. The chart was also updated to reflect a change in the Treasurer for Andrew Takami for US Senate (AF 3666).

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 Year-End Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

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

For your information, twenty-one (21) 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.

Allison for Congress (AF 3662) disclosed no activity after the RTB finding (previously estimated to be \$28,024), which would result in no civil money penalty (fine previously assessed to be \$1,230).

Aruna Miller for Congress (AF 3668) filed the 2018 Year-End 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 \$3,893 (previously estimated to be \$419,215), thus the fine would be lowered from \$13,080 to \$341.

Baria for Mississippi (AF 3669) filed the 2018 Year-End 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 \$16,512 (previously estimated to be \$247,331), thus the fine would be lowered from \$9,446 to \$684.

Carrigan for Congress (AF 3672) filed the 2018 Year-End 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 \$13,085 (previously estimated to be \$50,527), thus the fine would be lowered from \$3,925 to \$684.

Deaglan McEachern for Congress (AF 3680) filed the 2018 Year-End 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 \$11,754 (previously estimated to be \$133,618), thus the fine would be lowered from \$6,541 to \$684.

Ethan Pham for Congress (AF 3683) disclosed no activity after the RTB finding (previously estimated to be \$179,817), which would result in no civil money penalty (fine previously assessed to be \$7,994).

Finance Committee for Douglas Howard Pierce (AF 3685) disclosed no activity after the RTB finding (previously estimated to be \$32,133), which would result in no civil money penalty (fine previously assessed to be \$1,230).

Friends of Danner Kline (AF 3686) disclosed no activity after the RTB finding (previously estimated to be \$63,874), which would result in no civil money penalty (fine previously assessed to be \$3,925).

Friends of Edwin Santana Jr. for Congress (AF 3688) filed the 2018 Year-End 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 \$89 (previously estimated to be \$19,627), thus the fine would be lowered from \$684 to \$89.

Fulton Financial Corporation PAC (AF 3689) filed the 2018 Year-End 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 \$3,958 (previously estimated to be \$28,694), thus the fine would be lowered from \$1,230 to \$341.

Hart 2020 (AF 3692) disclosed no activity after the RTB finding (previously estimated to be \$225,782), which would result in no civil money penalty (fine previously assessed to be \$9,446).

Lake for Congress (AF 3696) filed the 2018 Year-End Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$1,782 (previously estimated to be \$44,240), thus the fine would be lowered from \$1,230 to \$341.

Liberty T (AF 3697) disclosed no activity after the RTB finding (previously estimated to be \$7,367), which would result in no civil money penalty (fine previously assessed to be \$410).

Malarsie House Run 2018 (AF 3698) disclosed no activity after the RTB finding (previously estimated to be \$43,422), which would result in no civil money penalty (fine previously assessed to be \$1,230).

People for Corbin-Johnson (AF 3701) disclosed no activity after the RTB finding (previously estimated to be \$96,126), which would result in no civil money penalty (fine previously assessed to be \$5,086).

Plumbers and Pipefitters Local Union 74 (AF 3702) filed the 2018 Year-End 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 \$7,150 (previously estimated to be \$40,494), thus the fine would be lowered from \$1,845 to \$615.

Roel Garcia for Congress (AF 3704) disclosed no activity after the RTB finding (previously estimated to be \$25,695), which would result in no civil money penalty (fine previously assessed to be \$1,230).

Shayani for Congress 2018 (AF 3709) disclosed no activity after the RTB finding (previously estimated to be \$56,461), which would result in no civil money penalty (fine previously assessed to be \$3,925).

Solomon for Congress (AF 3710) disclosed no activity after the RTB finding (previously estimated to be \$112,156), which would result in no civil money penalty (fine previously assessed to be \$6,541).

Thomas for First (AF 3714) filed the 2018 Year-End 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 \$204 (previously estimated to be \$124,036), thus the fine would be lowered from \$6,541 to \$204.

Tim Aalders for US Senate (AF 3715) disclosed no activity after the RTB finding (previously estimated to be \$53,249), which would result in no civil money penalty (fine previously assessed to be \$3,925).

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

Andrew Takami for US Senate (AF 3666) filed an Amended Statement of Organization after the RTB finding designating Andrew Takami as Treasurer.

The previous Treasurer for Jonathan Jenkins for Senate Committee (AF 3695) filed a Miscellaneous Text Submission after the RTB finding indicating his intent to resign. As of today, a new Treasurer has not been officially appointed.

We Are Great Again PAC (AF 3719) filed an Amended Statement of Organization after the RTB finding designating Chris Marston as Treasurer.

### **RAD Recommendation**

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (3) Send the appropriate letters.

Federal Election Commission  
FD Circulation Report Fine Paid  
2018 YEAR-END Not Election Sensitive 01/31/2019 H\_S\_P\_UNAUTH

| AF#  | Committee Name                                 | Candidate Name         | Committee ID | Treasurer               | Receipt Date | Days Late  | LOA       | PV | RTB Date   | RTB Penalty | Final Money Penalty | Date Paid  | Amount Paid |
|------|------------------------------------------------|------------------------|--------------|-------------------------|--------------|------------|-----------|----|------------|-------------|---------------------|------------|-------------|
| 3666 | ANDREW TAKAMI FOR US SENATE                    | ANDREW BENJAMIN TAKAMI | C00638692    | ANDREW TAKAMI           | 03/26/2019   | Not Filed* | \$298     | 0  | 04/05/2019 | \$298       | \$298               | 05/13/2019 | \$298       |
| 3671 | BOPHA MALONE FOR CONGRESS                      | BOPHA MALONE           | C00661413    | JOSH ASLANIAN           | 04/01/2019   | Not Filed* | \$3,563   | 0  | 04/05/2019 | \$341       | \$341               | 04/24/2019 | \$341       |
| 3676 | COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS | MAURO EVERETT GARZA    | C00663435    | ELIZABETH IRIS CASTILLO | 03/05/2019   | Not Filed* | \$206     | 0  | 04/05/2019 | \$206       | \$206               | 05/07/2019 | \$206       |
| 3684 | FEMINIST MAJORITY PAC                          |                        | C00377168    | PEG YORKIN              | 02/13/2019   | 13         | \$1,207   | 0  | 04/05/2019 | \$113       | \$113               | 04/23/2019 | \$113       |
| 3693 | INSPIRE BRANDS INC. POLITICAL ACTION COMMITTEE |                        | C00492157    | DANTON NOLAN            | 02/13/2019   | 13         | \$594     | 0  | 04/05/2019 | \$113       | \$113               | 04/18/2019 | \$113       |
| 3694 | JASON NICHOLS FOR CONGRESS                     | JASON NICHOLS          | C00660977    | JASON NICHOLS           | 02/19/2019   | 19         | \$1,536   | 0  | 04/05/2019 | \$149       | \$149               | 05/20/2019 | \$149       |
| 3711 | TEXANS FOR TEXAS                               |                        | C00641571    | DAVID TERRY             | 03/18/2019   | Not Filed* | \$384     | 0  | 04/05/2019 | \$341       | \$341               | 05/15/2019 | \$341       |
| 3713 | THE UTE PAC                                    |                        | C00626671    | SKYLER MASSY            | 03/07/2019   | Not Filed* | \$145     | 0  | 04/05/2019 | \$145       | \$145               | 05/20/2019 | \$145       |
| 3719 | WE ARE GREAT AGAIN PAC                         |                        | C00683813    | CHRIS MARSTON           | 02/22/2019   | 22         | \$139,980 | 0  | 04/05/2019 | \$4,875     | \$4,875             | 05/14/2019 | \$4,875     |

\* The committee filed their report more than thirty (30) days after the report due date; therefore, per 11 C.F.R. 111.43(e), the report is considered to be not filed.

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2018 YEAR-END Not Election Sensitive 01/31/2019 H\_S\_P\_UNAUTH

| AF#  | Committee Name                              | Candidate Name           | Committee ID | Treasurer             | Receipt Date | Days Late  | LOA               | PV | RTB Date   | RTB Penalty | Days Since RTB | FD Penalty |
|------|---------------------------------------------|--------------------------|--------------|-----------------------|--------------|------------|-------------------|----|------------|-------------|----------------|------------|
| 3662 | ALLISON FOR CONGRESS                        | ALLISON GALBRAITH        | C00637462    | TIMOTHY ROTHERMEL     |              | Not Filed  | \$0               | 0  | 04/05/2019 | \$1,230     | 427            | NONE       |
| 3663 | AMERICA COMES FIRST PAC                     |                          | C00623256    | DAVID W. SCHAMENS     |              | Not Filed  | \$154,404 (est)   | 5  | 04/05/2019 | \$17,986    | 427            | \$17,986   |
| 3668 | ARUNA MILLER FOR CONGRESS                   | ARUNA MILLER             | C00639427    | SUDHIR SEKHSARIA      | 05/10/2019   | Not Filed* | \$3,893           | 0  | 04/05/2019 | \$13,080    | 427            | \$341      |
| 3669 | BARIA FOR MISSISSIPPI                       | DAVID WAYNE BARIA        | C00673459    | WILL GODFREY          | 04/19/2019   | Not Filed* | \$16,512          | 0  | 04/05/2019 | \$9,446     | 427            | \$684      |
| 3670 | BILLY KOVACS FOR CONGRESS                   | WILLIAM RICHARD KOVACS   | C00636175    | BILLY KOVACS          |              | Not Filed  | \$20,606 (est)    | 0  | 04/05/2019 | \$684       | 427            | \$684      |
| 3672 | CARRIGAN FOR CONGRESS                       | SEAN J. CARRIGAN         | C00652321    | KADENIA JAVIS         | 04/11/2019   | Not Filed* | \$13,085          | 0  | 04/05/2019 | \$3,925     | 427            | \$684      |
| 3673 | COMMITTEE TO ELECT ENOCH                    | VANESSA L. ENOCH         | C00667279    | CATHERINE JOHNSON     | 11/10/2019   | Not Filed* | \$272             | 0  | 04/05/2019 | \$684       | 427            | \$272      |
| 3674 | COMMITTEE TO ELECT HP                       | HAMID PARVIZIAN          | C00663104    | DOUNIA METOURI        |              | Not Filed  | \$106,911 (est)   | 0  | 04/05/2019 | \$6,541     | 427            | \$6,541    |
| 3679 | DALE KERNS FOR OFFICE                       | DALE RONALD KERNS JR.    | C00634865    | JOSEPH P. SOLOSKI     |              | Not Filed  | \$50,439 (est)    | 0  | 04/05/2019 | \$3,925     | 427            | \$3,925    |
| 3680 | DEAGLAN MCEACHERN FOR CONGRESS              | DEAGLAN MCEACHERN        | C00665364    | LORI TIERNAN          | 06/06/2019   | Not Filed* | \$11,754          | 0  | 04/05/2019 | \$6,541     | 427            | \$684      |
| 3681 | DOROTHY GASQUE FOR CONGRESS                 | DOROTHY GASQUE           | C00630798    | MEGAN JONES           |              | Not Filed  | \$19,152 (est)    | 0  | 04/05/2019 | \$684       | 427            | \$684      |
| 3682 | ERIC FOR US                                 | ERIC HOLGUIN             | C00641340    | ELIZABETH PEREZ       | 03/18/2019   | Not Filed* | \$1,753           | 0  | 04/05/2019 | \$341       | 427            | \$341      |
| 3683 | ETHAN PHAM FOR CONGRESS                     | ETHAN PHAM               | C00650929    | JENNY NGUYEN          |              | Not Filed  | \$0               | 0  | 04/05/2019 | \$7,994     | 427            | NONE       |
| 3685 | FINANCE COMMITTEE FOR DOUGLAS HOWARD PIERCE | DOUGLAS HOWARD PIERCE    | C00610022    | DOUGLAS HOWARD PIERCE |              | Not Filed  | \$0               | 0  | 04/05/2019 | \$1,230     | 427            | NONE       |
| 3686 | FRIENDS OF DANNER KLINE                     | DANNER KLINE             | C00638536    | WILLIAM DAVIS         |              | Not Filed  | \$0               | 0  | 04/05/2019 | \$3,925     | 427            | NONE       |
| 3688 | FRIENDS OF EDWIN SANTANA JR. FOR CONGRESS   | EDWIN SANTANA JR.        | C00630434    | TRACY LEE SANTANA     | 04/15/2019   | Not Filed* | \$89              | 0  | 04/05/2019 | \$684       | 427            | \$89       |
| 3689 | FULTON FINANCIAL CORPORATION PAC            |                          | C00400317    | MICHAEL J. DEPORTER   | 04/12/2019   | Not Filed* | \$3,958           | 0  | 04/05/2019 | \$1,230     | 427            | \$341      |
| 3691 | GREG PILKINGTON FOR CONGRESS                | JAMES GREGORY PILKINGTON | C00634048    | PHYLLIS WHITNEY       |              | Not Filed  | \$21,331 (est)    | 0  | 04/05/2019 | \$684       | 427            | \$684      |
| 3692 | HART 2020                                   | HART P. CUNNINGHAM       | C00664086    | HART C. CUNNINGHAM    |              | Not Filed  | \$0               | 0  | 04/05/2019 | \$9,446     | 427            | NONE       |
| 3695 | JONATHAN JENKINS FOR SENATE COMMITTEE       | JONATHAN JENKINS         | C00677872    | OFFICE OF TREASURER   |              | Not Filed  | \$1,049,103 (est) | 0  | 04/05/2019 | \$17,440    | 427            | \$17,440   |
| 3696 | LAKE FOR CONGRESS                           | JEANNINE LEE LAKE        | C00678557    | JESSE NAHSHON PRATER  |              | Not Filed  | \$1,782           | 0  | 04/05/2019 | \$1,230     | 427            | \$341      |
| 3697 | LIBERTY T                                   |                          | C00622910    | SAMUEL B. CASEY       | 05/30/2019   | Not Filed* | \$0               | 0  | 04/05/2019 | \$684       | 427            | NONE       |
| 3698 | MALARSIE HOUSE RUN 2018                     | MARY MALARSIE            | C00665372    | TERRY BLEVINS         |              | Not Filed  | \$0               | 0  | 04/05/2019 | \$1,230     | 427            | NONE       |
| 3699 | MARTY GEARHEART FOR CONGRESS                | MARTY GEARHEART          | C00664516    | NISHANT GROVER        |              | Not Filed  | \$60,887 (est)    | 0  | 04/05/2019 | \$3,925     | 427            | \$3,925    |
| 3700 | NEW NATION RISING                           |                          | C00634964    | OLUFEMI OGUNNAIKE     |              | Not Filed  | \$252,158 (est)   | 0  | 04/05/2019 | \$11,627    | 427            | \$11,627   |
| 3701 | PEOPLE FOR CORBIN-JOHNSON                   | SHAVONNIA CORBIN-JOHNSON | C00657189    | JOSEPH BACHMAN        | 04/30/2019   | Not Filed* | \$0               | 0  | 04/05/2019 | \$5,086     | 427            | NONE       |
| 3702 | PLUMBERS AND PIPEFITTERS LOCAL UNION 74     |                          | C00192849    | MICHAEL B. HACKENDORN | 04/08/2019   | Not Filed* | \$7,150           | 2  | 04/05/2019 | \$1,845     | 427            | \$615      |
| 3703 | REUBEN FOR CONGRESS                         | REUBEN D'SILVA           | C00647560    | BREON KING            |              | Not Filed  | \$39,226 (est)    | 0  | 04/05/2019 | \$1,230     | 427            | \$1,230    |
| 3704 | ROEL GARCIA FOR CONGRESS                    | ROEL GARCIA              | C00661256    | ROCIO GARCIA          | 07/10/2019   | Not Filed* | \$0               | 0  | 04/05/2019 | \$1,230     | 427            | NONE       |
| 3705 | ROZA CALDERON FOR CONGRESS 2018             | ROZA I. CALDERON         | C00640755    | MICHAEL WILIAMS       |              | Not Filed  | \$32,375 (est)    | 1  | 04/05/2019 | \$1,537     | 427            | \$1,537    |
| 3706 | RURAL PROGRESS                              |                          | C00671040    | NATHANIEL IRVIN       |              | Not Filed  | \$36,791 (est)    | 0  | 04/05/2019 | \$1,230     | 427            | \$1,230    |
| 3708 | SARAH SMITH 2018                            | SARAH SMITH              | C00640151    | ANDY LO               |              | Not Filed  | \$26,475 (est)    | 0  | 04/05/2019 | \$1,230     | 427            | \$1,230    |

| AF#  | Committee Name            | Candidate Name       | Committee ID | Treasurer               | Receipt Date | Days Late  | LOA            | PV | RTB Date   | RTB Penalty | Days Since RTB | FD Penalty |
|------|---------------------------|----------------------|--------------|-------------------------|--------------|------------|----------------|----|------------|-------------|----------------|------------|
| 3709 | SHAYANI FOR CONGRESS 2018 | PAYAM MARK SHAYANI   | C00659326    | SHAROKIN VARDEH-DARIUSH |              | Not Filed  | \$0            | 0  | 04/05/2019 | \$3,925     | 427            | NONE       |
| 3710 | SOLOMON FOR CONGRESS      | ROBERT SOLOMON       | C00649947    | ROBERT CHARLES SOLOMON  |              | Not Filed  | \$0            | 0  | 04/05/2019 | \$6,541     | 427            | NONE       |
| 3712 | THE SEASONAL EMPLOYER PAC |                      | C00626564    | ELIZABETH WHITLEY       | 02/08/2019   | 8          | \$5,136        | 0  | 04/05/2019 | \$116       | 427            | \$116      |
| 3714 | THOMAS FOR FIRST          | THOMAS RUDBECK       | C00674978    | THOMAS RUDBECK          | 11/14/2019   | Not Filed* | \$204          | 0  | 04/05/2019 | \$6,541     | 427            | \$204      |
| 3715 | TIM AALDERS FOR US SENATE | TIMOTHY NOEL AALDERS | C00678300    | TIM AALDERS             | 04/11/2019   | Not Filed* | \$0            | 0  | 04/05/2019 | \$3,925     | 427            | NONE       |
| 3716 | TIM RICH FOR CONGRESS     | TIMOTHY A. RICH      | C00649368    | TIMOTHY A. RICH         |              | Not Filed  | \$45,538 (est) | 0  | 04/05/2019 | \$1,230     | 427            | \$1,230    |
| 3717 | TO ELECT JENNY MARSHALL   | JENNIFER MARSHALL    | C00629881    | JENNIFER MARSHALL       |              | Not Filed  | \$37,075 (est) | 0  | 04/05/2019 | \$1,230     | 427            | \$1,230    |

\* The committee filed their report more than thirty (30) days after the report due date; therefore, per 11 C.F.R. 111.43(e), the report is considered to be not filed.

## BEFORE THE FEDERAL ELECTION COMMISSION

|                                        |   |          |
|----------------------------------------|---|----------|
| In the Matter of                       | ) |          |
|                                        | ) |          |
| Withdrawal and Resubmission of Final   | ) |          |
| Determination Recommendation - 2018    | ) |          |
| Year-End Report for the Administrative | ) |          |
| Fine Program:                          | ) |          |
| ALLISON FOR CONGRESS, and              | ) | AF# 3662 |
| ROTHERMEL, TIMOTHY as treasurer;       | ) |          |
| AMERICA COMES FIRST PAC, and           | ) | AF# 3663 |
| SCHAMENS, DAVID W MR. as treasurer;    | ) |          |
| ANDREW TAKAMI FOR US SENATE,           | ) | AF# 3666 |
| and TAKAMI, ANDREW as treasurer;       | ) |          |
| ARUNA MILLER FOR CONGRESS, and         | ) | AF# 3668 |
| SEKHSARIA, SUDHIR MD as treasurer;     | ) |          |
| BARIA FOR MISSISSIPPI, and             | ) | AF# 3669 |
| GODFREY, WILL as treasurer;            | ) |          |
| BILLY KOVACS FOR CONGRESS, and         | ) | AF# 3670 |
| KOVACS, BILLY as treasurer;            | ) |          |
| BOPHA MALONE FOR CONGRESS, and         | ) | AF# 3671 |
| ASLANIAN, JOSH MR. as treasurer;       | ) |          |
| CARRIGAN FOR CONGRESS, and             | ) | AF# 3672 |
| JAVIS, KADENIA as treasurer;           | ) |          |
| COMMITTEE TO ELECT ENOCH, and          | ) | AF# 3673 |
| JOHNSON, CATHERINE as treasurer;       | ) |          |
| COMMITTEE TO ELECT HP, and             | ) | AF# 3674 |
| METOURI, DOUNIA as treasurer;          | ) |          |
| DALE KERNS FOR OFFICE, and JOSEPH      | ) | AF# 3679 |
| P SOLOSKI as treasurer;                | ) |          |
| DEAGLAN MCEACHERN FOR                  | ) | AF# 3680 |
| CONGRESS, and TIERNAN, LORI as         | ) |          |
| treasurer;                             | ) |          |
| DOROTHY GASQUE FOR CONGRESS,           | ) | AF# 3681 |
| and JONES, MEGAN as treasurer;         | ) |          |
| ERIC FOR US, and PEREZ, ELIZABETH      | ) | AF# 3682 |
| as treasurer;                          | ) |          |
| ETHAN PHAM FOR CONGRESS, and           | ) | AF# 3683 |
| NGUYEN, JENNY as treasurer;            | ) |          |

Federal Election Commission  
 Certification for Withdrawal and  
 Resubmission of Final Determination  
 Recommendation – 2018 Year End Report  
 for the Administrative Fine Program  
 June 29, 2020

|                                                                                            |            |
|--------------------------------------------------------------------------------------------|------------|
| FEMINIST MAJORITY PAC, and PEG<br>YORKIN as treasurer;                                     | AF# 3684   |
| FINANCE COMMITTEE FOR DOUGLAS<br>HOWARD PIERCE, and DOUGLAS<br>HOWARD PIERCE as treasurer; | ) AF# 3685 |
| FRIENDS OF DANNER KLINE, and<br>DAVIS, WILLIAM as treasurer;                               | ) AF# 3686 |
| FRIENDS OF EDWIN SANTANA JR.<br>FOR CONGRESS, and SANTANA,<br>TRACY LEE as treasurer;      | ) AF# 3688 |
| FULTON FINANCIAL CORPORATION<br>PAC, and MICHAEL J DEPORTER as<br>treasurer;               | ) AF# 3689 |
| GREG PILKINGTON FOR CONGRESS,<br>and WHITNEY, PHYLLIS as treasurer;                        | ) AF# 3691 |
| HART 2020, and CUNNINGHAM, HART<br>C. as treasurer;                                        | ) AF# 3692 |
| INSPIRE BRANDS INC. POLITICAL<br>ACTION COMMITTEE, and NOLAN,<br>DANTON as treasurer;      | ) AF# 3693 |
| JASON NICHOLS FOR CONGRESS, and<br>NICHOLS, JASON as treasurer;                            | ) AF# 3694 |
| LAKE FOR CONGRESS, and PRATER,<br>NAHSHON JESSE MR. as treasurer;                          | ) AF# 3696 |
| LIBERTY T, and CASEY, SAMUEL B as<br>treasurer;                                            | ) AF# 3697 |
| MALARSIE HOUSE RUN 2018, and<br>BLEVINS, TERRY as treasurer;                               | ) AF# 3698 |
| MARTY GEARHEART FOR CONGRESS,<br>and GROVER, NISHANT as treasurer;                         | ) AF# 3699 |
| NEW NATION RISING, and<br>OGUNNAIKE, OLUFEMI as treasurer;                                 | ) AF# 3700 |
| PEOPLE FOR CORBIN-JOHNSON, and<br>BACHMAN, JOSEPH as treasurer;                            | ) AF# 3701 |
| PLUMBERS AND PIPEFITTERS LOCAL<br>UNION 74, and HACKENDORN,<br>MICHAEL B as treasurer;     | ) AF# 3702 |
| REUBEN FOR CONGRESS, and KING,<br>BREON as treasurer;                                      | ) AF# 3703 |
| ROEL GARCIA FOR CONGRESS, and<br>GARCIA, ROCIO as treasurer;                               | ) AF# 3704 |

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|                                   |   |          |
|-----------------------------------|---|----------|
| ROZA CALDERON FOR CONGRESS        | ) | AF# 3705 |
| 2018, and WILIAMS, MICHAEL as     | ) |          |
| treasurer;                        | ) |          |
| RURAL PROGRESS, and IRVIN,        | ) | AF# 3706 |
| NATHANIEL as treasurer;           | ) |          |
| SARAH SMITH 2018, and LO, ANDY as | ) | AF# 3708 |
| treasurer;                        | ) |          |
| SHAYANI FOR CONGRESS 2018, and    | ) | AF# 3709 |
| VARDEH-DARIUSH, SHAROKIN as       | ) |          |
| treasurer;                        | ) |          |
| SOLOMON FOR CONGRESS, and         | ) | AF# 3710 |
| SOLOMON, ROBERT CHARLES DR. as    | ) |          |
| treasurer;                        | ) |          |
| TEXANS FOR TEXAS, and TERRY,      | ) | AF# 3711 |
| DAVID as treasurer;               | ) |          |
| THE SEASONAL EMPLOYER PAC, and    | ) | AF# 3712 |
| ELIZABETH WHITLEY as treasurer;   | ) |          |
| UTEPAC, and MASSY, SKYLER MR as   | ) | AF# 3713 |
| treasurer;                        | ) |          |
| THOMAS FOR FIRST, and RUDBECK,    | ) | AF# 3714 |
| THOMAS as treasurer;              | ) |          |
| TIM AALDERS FOR US SENATE, and    | ) | AF# 3715 |
| AALDERS, TIM as treasurer;        | ) |          |
| TIM RICH FOR CONGRESS, and RICH,  | ) | AF# 3716 |
| TIMOTHY A as treasurer;           | ) |          |
| TO ELECT JENNY MARSHALL, and      | ) | AF# 3717 |
| MARSHALL, JENNIFER as treasurer;  | ) |          |
| WE ARE GREAT AGAIN PAC, and       | ) | AF# 3719 |
| MARSTON, CHRIS as treasurer;      | ) |          |

AMENDED 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 Year-End Report 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 19, 2020, on the following committees:

AF#3662 Decided by a vote of 4-0 to: (1) make a final determination that ALLISON FOR CONGRESS, and ROTHERMEL, TIMOTHY in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3663 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.

AF#3666 Decided by a vote of 4-0 to: (1) make a final determination that ANDREW TAKAMI FOR US SENATE, and TAKAMI, ANDREW 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#3668 Decided by a vote of 4-0 to: (1) make a final determination that ARUNA MILLER FOR CONGRESS, and SEKHSARIA, SUDHIR MD 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#3669 Decided by a vote of 4-0 to: (1) make a final determination that BARIA FOR MISSISSIPPI, and GODFREY, WILL 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#3670 Decided by a vote of 4-0 to: (1) make a final determination that BILLY KOVACS FOR CONGRESS, and KOVACS, BILLY 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#3671 Decided by a vote of 4-0 to: (1) make a final determination that BOPHA MALONE FOR CONGRESS, and ASLANIAN, JOSH 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#3672 Decided by a vote of 4-0 to: (1) make a final determination that CARRIGAN FOR CONGRESS, and JAVIS, KADENIA 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#3673 Decided by a vote of 4-0 to: (1) make a final determination that COMMITTEE TO ELECT ENOCH, and JOHNSON, CATHERINE 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#3674 Decided by a vote of 4-0 to: (1) make a final determination that COMMITTEE TO ELECT HP, and METOURI, DOUNIA 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#3679 Decided by a vote of 4-0 to: (1) make a final determination that DALE KERNS FOR OFFICE, and JOSEPH P SOLOSKI 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#3680 Decided by a vote of 4-0 to: (1) make a final determination that DEAGLAN MCEACHERN FOR CONGRESS, and TIERNAN, LORI 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#3681 Decided by a vote of 4-0 to: (1) make a final determination that DOROTHY GASQUE FOR CONGRESS, and JONES, MEGAN 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#3682 Decided by a vote of 4-0 to: (1) make a final determination that ERIC FOR US, and PEREZ, ELIZABETH 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#3683 Decided by a vote of 4-0 to: (1) make a final determination that ETHAN PHAM FOR CONGRESS, and NGUYEN, JENNY in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3684 Decided by a vote of 4-0 to: (1) make a final determination that FEMINIST MAJORITY PAC, and PEG YORKIN 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#3685 Decided by a vote of 4-0 to: (1) make a final determination that FINANCE COMMITTEE FOR DOUGLAS HOWARD PIERCE, and DOUGLAS HOWARD PIERCE in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3686 Decided by a vote of 4-0 to: (1) make a final determination that FRIENDS OF DANNER KLINE, and DAVIS, WILLIAM in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3688 Decided by a vote of 4-0 to: (1) make a final determination that FRIENDS OF EDWIN SANTANA JR. FOR CONGRESS, and SANTANA, TRACY LEE 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#3689 Decided by a vote of 4-0 to: (1) make a final determination that FULTON FINANCIAL CORPORATION PAC, and MICHAEL J DEPORTER 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#3691 Decided by a vote of 4-0 to: (1) make a final determination that GREG PILKINGTON FOR CONGRESS, and WHITNEY, PHYLLIS 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#3692 Decided by a vote of 4-0 to: (1) make a final determination that HART 2020, and CUNNINGHAM, HART C. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3693 Decided by a vote of 4-0 to: (1) make a final determination that INSPIRE BRANDS INC. POLITICAL ACTION COMMITTEE, and NOLAN, DANTON 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#3694 Decided by a vote of 4-0 to: (1) make a final determination that JASON NICHOLS FOR CONGRESS, and NICHOLS, JASON 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#3696 Decided by a vote of 4-0 to: (1) make a final determination that LAKE FOR CONGRESS, and PRATER, NAHSHON JESSE 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#3697 Decided by a vote of 4-0 to: (1) make a final determination that LIBERTY T, and CASEY, SAMUEL B in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3698 Decided by a vote of 4-0 to: (1) make a final determination that MALARSIE HOUSE RUN 2018, and BLEVINS, TERRY in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3699 Decided by a vote of 4-0 to: (1) make a final determination that MARTY GEARHEART FOR CONGRESS, and GROVER, NISHANT 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#3700 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#3701 Decided by a vote of 4-0 to: (1) make a final determination that PEOPLE FOR CORBIN-JOHNSON, and BACHMAN, JOSEPH in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3702 Decided by a vote of 4-0 to: (1) make a final determination that PLUMBERS AND PIPEFITTERS LOCAL UNION 74, and HACKENDORN, MICHAEL B in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3703 Decided by a vote of 4-0 to: (1) make a final determination that REUBEN FOR CONGRESS, and KING, BREON 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#3704 Decided by a vote of 4-0 to: (1) make a final determination that ROEL GARCIA FOR CONGRESS, and GARCIA, ROCIO in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3705 Decided by a vote of 4-0 to: (1) make a final determination that ROZA CALDERON FOR CONGRESS 2018, and WILIAMS, MICHAEL 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#3706 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.

AF#3708 Decided by a vote of 4-0 to: (1) make a final determination that SARAH SMITH 2018, and LO, ANDY 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#3709 Decided by a vote of 4-0 to: (1) make a final determination that SHAYANI FOR CONGRESS 2018, and VARDEH-DARIUSH, SHAROKIN in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3710 Decided by a vote of 4-0 to: (1) make a final determination that SOLOMON FOR CONGRESS, and SOLOMON, ROBERT CHARLES DR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3711 Decided by a vote of 4-0 to: (1) make a final determination that TEXANS FOR TEXAS, and TERRY, 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.

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AF#3712 Decided by a vote of 4-0 to: (1) make a final determination that THE SEASONAL EMPLOYER PAC, and ELIZABETH WHITLEY 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#3713 Decided by a vote of 4-0 to: (1) make a final determination that UTEPAC, and MASSY, SKYLER 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#3714 Decided by a vote of 4-0 to: (1) make a final determination that THOMAS FOR FIRST, and RUDBECK, THOMAS 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#3715 Decided by a vote of 4-0 to: (1) make a final determination that TIM AALDERS FOR US SENATE, and AALDERS, TIM in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3716 Decided by a vote of 4-0 to: (1) make a final determination that TIM RICH FOR CONGRESS, and RICH, TIMOTHY 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#3717 Decided by a vote of 4-0 to: (1) make a final determination that TO ELECT JENNY MARSHALL, and MARSHALL, JENNIFER 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#3719 Decided by a vote of 4-0 to: (1) make a final determination that WE ARE GREAT AGAIN 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.

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July 26, 2020  
Date

Attest:

Laura  
Sinram

Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission

Digitally signed by  
Laura Sinram  
Date: 2020.07.26  
22:29:27 -04'00'



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

July 29, 2020

David Terry, in official capacity as Treasurer  
Texans for Texas  
4030 Sandshell Drive  
Fort Worth, TX 76137

C00641571

AF#: 3711

Dear Mr. Terry,

On April 5, 2019, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Texans for Texas and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the Year-End Report. By letter dated April 8, 2019, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$341 in accordance with the schedule of penalties at 11 CFR § 111.43.

On May 15, 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 Texans for Texas and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$341 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 stylized with a large, flowing "J" and "E".

James E. "Trey" Trainor III  
Chair

THIS IS THE END OF ADMINISTRATIVE FINE CASE #3711