

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE #3766



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 5, 2020

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Withdrawal and Resubmission of Reason To Believe Recommendation –  
2019 Year-End Report for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on March 31, 2020 in order to reflect updates disclosed in filings received by the Commission after the initial submission of this recommendation. On May 22, 2020, Abe Matthew for Congress (AF 3765) filed an Amended 2019 Year-End Report that disclosed a level of activity higher than previously disclosed. On April 14, 2020, Jineea for Congress (AF 3772) filed a 2019 Year-End Report that disclosed a level of activity higher than previously estimated. The circulation report has been updated to reflect the level of activity and civil money penalty amounts disclosed on the most recent filings for AF 3765 and AF 3772. The document was also updated to reflect a change in the Treasurer for Tarrant County Republican Victory Fund (AF 3779).

Attached is a list of political committees and their treasurers who failed to file the 2019 Year-End Report in accordance with 52 U.S.C. § 30104(a). The Year-End Report was due on January 31, 2020.

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.

**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.

Federal Election Commission  
Reason to Believe Circulation Report  
2019 YEAR-END Not Election Sensitive 01/31/2020 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3765	C00700831	ABE MATTHEW FOR CONGRESS	ABRAHAM THOMAS MATTHEW	DEMIJAN DRNOVSEK	\$126,094	0	3/1/2020	30	\$19,663	\$326
3766	C00687657	AMERICAN PRO-ISRAEL PAC		JEANNE SULLIVAN	\$137,162	0		Not Filed	\$137,162 (est)	\$6,541
3767	C00663104	COMMITTEE TO ELECT HP	HAMID PARVIZIAN	DOUNIA METOURI	\$106,911	2		Not Filed	\$106,911 (est)	\$9,811
3768	C00663435	COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS	MAURO EVERETT GARZA	ELIZABETH IRIS CASTILLO	\$154,433	1	2/28/2020	28	\$108,058	\$7,458
3769	C00655084	FRIENDS OF MARC FRIEDENBERG	MARC FRIEDENBERG	SEAN MILLER	\$439,083	0		Not Filed	\$146,361 (est)	\$6,541
3770	C00695619	HEALTH JUSTICE FOR ALL		ERIC FEIGL-DING	\$232,095	0		Not Filed	\$58,023 (est)	\$3,925
3771	C00581199	JILL STEIN FOR PRESIDENT	JILL STEIN	STEVEN WELZER	\$282,534	14		Not Filed	\$70,634 (est)	\$17,662
3772	C00709758	JINEEA FOR CONGRESS	JINEEA BUTLER	ANITA MEADOR	\$447,436	0	4/14/2020	*Not Filed	\$326,262	\$11,627
3773	C00698795	JOHN EAVES FOR CONGRESS	JOHN H. EAVES	JOHN HENRY EAVES	\$180,366	0		Not Filed	\$60,122 (est)	\$3,925
3774	C00677872	JONATHAN JENKINS FOR SENATE COMMITTEE	JONATHAN JENKINS	OFFICE OF TREASURER	\$1,049,103	0		Not Filed	\$1,049,103 (est)	\$17,440
3775	C00528026	NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC		MICHAEL J. CORREIA	\$128,095	0	2/20/2020	20	\$30,670	\$850
3777	C00172510	REPUBLICAN STATE COMMITTEE OF DELAWARE		DENNIS CINI	\$119,098	0		Not Filed	\$17,013 (est)	\$684
3778	C00615013	SHAUN BROWN FOR VIRGINIA	SHAUN DENISE BROWN	OCTAVIANUS SMITH	\$179,167	0		Not Filed	\$179,167 (est)	\$7,994
3779	C00406645	TARRANT COUNTY REPUBLICAN VICTORY FUND		SHANNON DUBBERLY	\$217,614	0	3/12/2020	*Not Filed	\$115	\$115
3780	C00426569	WESTERN ENERGY ALLIANCE PAC		KATHLEEN M. SGAMMA	\$137,108	0	2/12/2020	12	\$78,358	\$2,333

\* 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 )  
 ) AF 3766  
 Withdrawal and Resubmission of Reason )  
 To Believe Recommendation - 2019 )  
 Year-End Report for the Administrative )  
 Fine Program: American Pro-Israel PAC )  
 and Jeanne Sullivan in her official )  
 capacity as treasurer )

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 29, 2020, the Commission decided by a vote of 4-0 to take the following actions, as recommended in the Reports Analysis Division's Memorandum dated June 5, 2020, and subject to the Notice of Errata Memorandum dated June 19, 2020, in AF 3766:

1. Find reason to believe that American Pro-Israel PAC and Jeanne Sullivan in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that a civil money penalty in the amount of \$6,541 be assessed.
2. Send the appropriate letter.

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

  
 July 16, 2020  
 \_\_\_\_\_  
 Date

Attest:

**Laura  
Sinram**

\_\_\_\_\_  
 Laura E. Sinram  
 Acting Secretary and Clerk of the  
 Commission

Digitally signed by  
 Laura Sinram  
 Date: 2020.07.16  
 11:40:13 -04'00'



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

July 20, 2020

Jeanne Sullivan, in official capacity as Treasurer  
American Pro-Israel PAC  
1060 W Pipeline Road, Suite 110  
Hurst, TX 76053

**Response Due Date**

**08/08/2020**

C00687657

AF#: 3766

Dear Ms. Sullivan,

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 July 1, 2019 through December 31, 2019, shall be filed no later than January 31, 2020. 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 June 29, 2020, the FEC found that there is reason to believe ("RTB") that American Pro-Israel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before January 31, 2020. 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 \$6,541. 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 \$6,541 is due within forty (40) days of the finding, or by August 8, 2020, and is based on these factors:

Sensitivity of Report: Not Election Sensitive

Level of Activity: \$137,162

Number of Days Late: Not Filed

Number of Previous Civil Money Penalties Assessed: 0

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

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

## AMERICAN PRO-ISRAEL PAC

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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. 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 August 8, 2020. 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).

Please note, on June 18, 2020, the Federal Election Commission began the initial phase (Phase I) of its return to normal operations. At this stage, the agency's offices will remain closed to visitors and most of its employees will continue to telework in an effort to limit the spread of coronavirus (COVID-19). The Commission is processing some documents submitted by mail, though processing will not occur on a daily basis until the agency resumes normal mail operations. Nevertheless, a challenge to an RTB finding and/or calculated civil money penalty must be received on time. Thus, all written responses and supporting documentation should be converted to PDF (Portable Document Format) and must be emailed to [administrativefines@fec.gov](mailto:administrativefines@fec.gov). The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the date it is electronically received by staff.

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

AMERICAN PRO-ISRAEL PAC

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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 American Pro-Israel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 et seq. The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

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

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

## **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### **4. Partial Payments**

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

### **5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in

AMERICAN PRO-ISRAEL PAC

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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.

Sincerely,



James E. "Trey" Trainor III  
Chair

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#### ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$6,541 for the 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. Please use the details below to complete the required

AMERICAN PRO-ISRAEL PAC

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fields. For additional payment options, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

COMMITTEE NAME: American Pro-Israel PAC

FEC ID#: C00687657

AF#: 3766

PAYMENT DUE DATE: August 8, 2020

PAYMENT AMOUNT DUE: \$6,541

**RECEIVED**

By Office of the Commission Secretary at 5:21 pm, Nov 02, 2020



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

November 2, 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: Administrative Fine Program – Final Determination Recommendation for the 2019 Year-End Report

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 2019 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, two (2) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Friends of Marc Friedenber (AF 3769) disclosed no activity after the RTB finding (previously estimated to be \$146,361), which would result in no civil money penalty (fine previously assessed to be \$6,541).

Health Justice For All (AF 3770) filed the 2019 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 \$152 (previously estimated to be \$58,023), thus the fine would be lowered from \$3,925 to \$152.

For your information, one (1) committee disclosed a change in treasurer after the RTB finding. An overview of this case has been provided below.

Friends of Marc Friedenberf (AF 3769) filed an Amended Statement of Organization after the RTB finding designating Margaret Swoboda 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 committee and its treasurer, in her 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  
 2019 YEAR-END Not Election Sensitive 01/31/2020 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
3765	ABE MATTHEW FOR CONGRESS	ABRAHAM THOMAS MATTHEW	C00700831	DEMIJAN DRNOVSEK	03/01/2020	30	\$19,663	0	06/29/2020	\$326	\$326	08/07/2020	\$326
3775	NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC		C00528026	MICHAEL J. CORREIA	02/20/2020	20	\$30,670	0	06/29/2020	\$850	\$850	08/10/2020	\$850
3777	REPUBLICAN STATE COMMITTEE OF DELAWARE		C00172510	DENNIS CINI	08/11/2020	*Not Filed	\$14,120	0	06/29/2020	\$684	\$684	08/10/2020	\$684
3779	TARRANT COUNTY REPUBLICAN VICTORY FUND		C00406645	SHANNON DUBBERLY	03/12/2020	*Not Filed	\$70,102	0	06/29/2020	\$115	\$115	08/10/2020	\$115

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

Federal Election Commission  
 FD Circulation Report Fine Not Paid  
 2019 YEAR-END Not Election Sensitive 01/31/2020 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
3766	AMERICAN PRO-ISRAEL PAC		C00687657	JEANNE SULLIVAN		Not Filed	\$137,162 (est)	0	06/29/2020	\$6,541	126	\$6,541
3767	COMMITTEE TO ELECT HP	HAMID PARVIZIAN	C00663104	DOUNIA METOURI		Not Filed	\$106,911 (est)	2	06/29/2020	\$9,811	126	\$9,811
3768	COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS	MAURO EVERETT GARZA	C00663435	ELIZABETH IRIS CASTILLO	02/28/2020	28	\$108,058	1	06/29/2020	\$7,458	126	\$7,458
3769	FRIENDS OF MARC FRIEDENBERG	MARC FRIEDENBERG	C00655084	MARGARET SWOBODA	07/14/2020	*Not Filed	\$0	0	06/29/2020	\$6,541	126	NONE
3770	HEALTH JUSTICE FOR ALL		C00695619	ERIC FEIGL-DING	10/26/2020	*Not Filed	\$152	0	06/29/2020	\$3,925	126	\$152
3771	JILL STEIN FOR PRESIDENT	JILL STEIN	C00581199	STEVEN WELZER	09/23/2020	*Not Filed	\$61,217	14	06/29/2020	\$17,662	126	\$17,662
3772	JINEEA FOR CONGRESS	JINEEA BUTLER	C00709758	ANITA MEADOR	04/14/2020	*Not Filed	\$325,998	0	06/29/2020	\$11,627	126	\$11,627
3773	JOHN EAVES FOR CONGRESS	JOHN H. EAVES	C00698795	JOHN HENRY EAVES		Not Filed	\$60,122 (est)	0	06/29/2020	\$3,925	126	\$3,925
3774	JONATHAN JENKINS FOR SENATE COMMITTEE	JONATHAN JENKINS	C00677872	OFFICE OF TREASURER		Not Filed	\$1,049,103 (est)	0	06/29/2020	\$17,440	126	\$17,440

\* 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 )  
 )  
 Administrative Fine Program - Final )  
 Determination Recommendation for the )  
 2019 Year-End Report: )  
 ABE MATTHEW FOR CONGRESS, and ) AF# 3765  
 DRNOVSEK, DEMIJAN as treasurer; )  
 AMERICAN PRO-ISRAEL PAC, and ) AF# 3766  
 SULLIVAN, JEANNE as treasurer; )  
 COMMITTEE TO ELECT HP, and ) AF# 3767  
 METOURI, DOUNIA as treasurer; )  
 COMMITTEE TO ELECT MAURO ) AF# 3768  
 GARZA FOR US CONGRESS, and )  
 CASTILLO, IRIS ELIZABETH MS. as )  
 treasurer; )  
 HEALTH JUSTICE FOR ALL, and ) AF# 3770  
 FEIGL-DING, ERIC DR. as treasurer; )  
 JILL STEIN FOR PRESIDENT, and ) AF# 3771  
 WELZER, STEVEN as treasurer; )  
 JINEEA FOR CONGRESS, and MEADOR, ) AF# 3772  
 ANITA as treasurer; )  
 JOHN EAVES FOR CONGRESS, and ) AF# 3773  
 EAVES, JOHN HENRY as treasurer; )  
 NATIONAL CANNABIS INDUSTRY ) AF# 3775  
 ASSOCIATION PAC, and MICHAEL J. )  
 CORREIA as treasurer; )  
 REPUBLICAN STATE COMMITTEE OF ) AF# 3777  
 DELAWARE, and CINI, DENNIS as )  
 treasurer; )  
 TARRANT COUNTY REPUBLICAN ) AF# 3779  
 VICTORY FUND, and DUBBERLY, )  
 SHANNON as treasurer; )

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 07, 2021, the Commission took the following actions on the Administrative Fine Program - Final Determination Recommendation for the 2019 Year-End Report, as recommended in the Reports Analysis Division's Memorandum dated November 02, 2020, on the following committees:

AF#3765 Decided by a vote of 6-0 to: (1) make a final determination that ABE MATTHEW FOR CONGRESS, and DRNOVSEK, DEMIJAN 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3766 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN PRO-ISRAEL PAC, and SULLIVAN, JEANNE 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3767 Decided by a vote of 6-0 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3768 Decided by a vote of 6-0 to: (1) make a final determination that COMMITTEE TO ELECT MAURO GARZA FOR US CONGRESS, and CASTILLO, IRIS ELIZABETH MS. in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission  
Administrative Fine Program - Final  
Determination Recommendation for the  
2019 Year-End Report  
January 7, 2021

AF#3770 Decided by a vote of 6-0 to: (1) make a final determination that HEALTH JUSTICE FOR ALL, and FEIGL-DING, ERIC DR. 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3771 Decided by a vote of 6-0 to: (1) make a final determination that JILL STEIN FOR PRESIDENT, and WELZER, STEVEN 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3772 Decided by a vote of 6-0 to: (1) make a final determination that JINEEA FOR CONGRESS, and MEADOR, ANITA 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3773 Decided by a vote of 6-0 to: (1) make a final determination that JOHN EAVES FOR CONGRESS, and EAVES, JOHN HENRY in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3775 Decided by a vote of 6-0 to: (1) make a final determination that NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC, and MICHAEL J. CORREIA 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3777 Decided by a vote of 6-0 to: (1) make a final determination that REPUBLICAN STATE COMMITTEE OF DELAWARE, and CINI, DENNIS 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3779 Decided by a vote of 6-0 to: (1) make a final determination that TARRANT COUNTY REPUBLICAN VICTORY FUND, and DUBBERLY, SHANNON 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission  
Administrative Fine Program - Final  
Determination Recommendation for the  
2019 Year-End Report  
January 7, 2021



February 11, 2021

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Date

Attest:

**Laura  
Sinram**

Digitally signed by Laura  
Sinram  
Date: 2021.02.11  
20:35:26 -05'00'

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Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

February 17, 2021

Jeanne Sullivan, in official capacity as Treasurer  
American Pro-Israel PAC  
1060 W Pipeline Road, Suite 110  
Hurst, TX 76053

C00687657

AF#: 3766

Dear Ms. Sullivan,

On June 29, 2020, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that American Pro-Israel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2019 Year-End Report. By letter dated July 20, 2020, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$6,541 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, you, as treasurer, were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty. You must also file the Year-End Report if you have not already done so.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The FEC made a final determination on January 7, 2021 that American Pro-Israel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$6,541 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$137,162  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

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

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

If you choose to appeal the final determination, you should submit a written petition, within thirty (30) days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the

AMERICAN PRO-ISRAEL PAC

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

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

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

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

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

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

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

## **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### **4. Partial Payments**

AMERICAN PRO-ISRAEL PAC

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

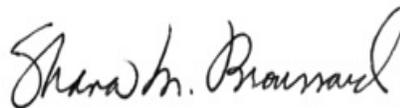
#### **5. Settlement Offers**

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

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

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

On behalf of the Commission,



Shana M. Broussard  
Chair

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

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$6,541 for the 2019 Year-End Report. The payment is due within 30 days of receipt of this letter.

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

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

COMMITTEE NAME: American Pro-Israel PAC

FEC ID#: C00687657

AF#: 3766

PAYMENT AMOUNT DUE: \$6,541

THIS IS THE END OF ADMINISTRATIVE FINE CASE #3766