



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

January 7, 2021

**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 –  
2020 August Monthly Report for the Administrative Fine Program

We are withdrawing the document circulated to the Commission on October 14, 2020 in order to reflect updates disclosed in filings received by the Commission after the initial submission of this recommendation. An overview of these updates has been provided below.

Attached is a list of political committees and their treasurers who failed to file the 2020 August Monthly Report in accordance with 52 U.S.C. § 30104(a). The August Monthly Report was due on August 20, 2020.

The committees listed on 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 CFR 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  
2020 AUGUST MONTHLY Not Election Sensitive 08/20/2020 P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3919	C00702324	CONSERVATIVES FOR A BETTER NORTH CAROLINA		SARA HENDRICKS	\$100,398	0		Not Filed	\$7,723 (est)	\$417

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 Withdrawal and Resubmission of Reason )  
 To Believe Recommendation - 2020 August )  
 Monthly Report for the Administrative Fine )  
 Program: )  
 CONSERVATIVES FOR A BETTER ) AF# 3919  
 NORTH CAROLINA, and HENDRICKS, )  
 SARA as treasurer; )

CERTIFICATION

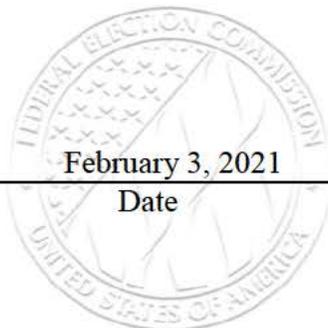
I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 08, 2021, the Commission took the following actions on the Withdrawal and Resubmission of Reason To Believe Recommendation - 2020 August Monthly Report for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated January 07, 2021, on the following committees:

AF#3919 Decided by a vote of 6-0 to: (1) find reason to believe that CONSERVATIVES FOR A BETTER NORTH CAROLINA, and HENDRICKS, SARA 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;

Federal Election Commission  
Withdrawal and Resubmission of Reason  
To Believe Recommendation - 2020  
August Monthly Report for the  
Administrative Fine Program  
January 8, 2021

Page 2

(2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.



Attest:

**Laura  
Sinram**

Digitally signed by  
Laura Sinram  
Date: 2021.02.03  
20:28:02 -05'00'

Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

February 4, 2021

Sara Hendricks, in official capacity as Treasurer  
Conservatives for a Better North Carolina  
521 New Bridge St.  
Jacksonville, NC 28540

C00702324  
AF#: 3919

Dear Ms. Hendricks,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an August Monthly Report of Receipts and Disbursements covering the period July 1, 2020 through July 31, 2020. This report shall be filed no later than August 20, 2020. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file 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. § 30109g(a)(4). On January 8, 2021, the FEC found that there is reason to believe ("RTB") that Conservatives for a Better North Carolina 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 August 20, 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 \$417. 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 \$417 is due within forty (40) days of the finding, or by February 17, 2021, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$7,723  
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**

## CONSERVATIVES FOR A BETTER NORTH CAROLINA

Page 2 of 5

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 February 17, 2021. 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 daily 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). 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).

## CONSERVATIVES FOR A BETTER NORTH CAROLINA

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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 Conservatives for a Better North Carolina and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

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

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

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

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS****4. Partial Payments**

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

**5. Settlement Offers**

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

## CONSERVATIVES FOR A BETTER NORTH CAROLINA

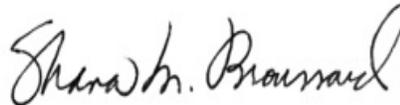
Page 4 of 5

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 Jacqueline Gausepohl 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,



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 amount of your civil money penalty calculated at RTB is \$417 for the August Monthly 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 fields. For additional payment options, please contact Jacqueline Gausepohl in the

CONSERVATIVES FOR A BETTER NORTH CAROLINA

Page 5 of 5

Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

COMMITTEE NAME: Conservatives for a Better North Carolina

FEC ID#: C00702324

AF#: 3919

PAYMENT DUE DATE: February 17, 2021

PAYMENT AMOUNT DUE: \$417

February 14, 2021

FEC Office of Administrative  
PO Box 979058  
St. Louis, MO 63197-9000

Re: Conservatives for a Better North Carolina  
AF#: 3919, 4011, 3927, 4015, 3853,3908

To Whom it May Concern,

I am writing this letter to challenge the penalty imposed for non-filing of the monthly reports June-October. The reports were not filed timely due to Covid-19. We were working part time from April-May and then June 1, 2020 I was furloughed, and the office closed. Starting this past week, February 8-12, 2021, we have been brought back in stages and since coming back, all reports have been filed. There has been no activity for this account as of 2/14/2021. I have included bank statements and the file acceptance for all reports. I have also included a letter from our Bank ( Coastal Bank) stating the account has become dormant to further prove there has been no activity. Before Covid hit all reports had been submitted and there were no penalties. We are asking the penalties to be forgiven and we will continue to stay compliant in our reporting.

Thank you for your time and consideration. If you have additional questions, please reach out to Sara Hendricks

Sincerely,

Sara Hendricks

NOV 1 2020

Coastal Bank & Trust  
2414 N Marine Blvd  
Jacksonville, NC 28546  
(910)577-3200

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

/27/20 Dormant Account Notice  
Account Product: CBT Business Checking

Account Number:



According to our records your account is in a dormant status. Your account is  
considered dormant after 12 months of no activity. Please contact the bank  
concerning this matter as soon as possible, otherwise, the account will incur a  
.00 dormant charge per month.

Thank you.  
Manager: Mickie Martin



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910-577-3200 • www.coastalbanknc.com

Return Service Requested

00000690-0001701-0001-0002-FIMR8003680131211257

FEB 8 2021

ACCOUNT [REDACTED]  
STATEMENT PERIOD 01/01/2021  
To 01/31/2021

**CONSERVATIVES FOR A BETTER NORTH CAROLIN**  
**521 NEW BRIDGE STREET**  
**JACKSONVILLE, NC 28540**

PAGE 1 of 2

To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

**TYPE OF ACCOUNT... CBT Business Checking**

**Summary of Activity Since Your Last Statement**

Balance Forward From 01/01/2021	4,591.94	Images Enclosed.....	1
1 Deposits/Credits.....	10.00 +	Minimum Balance.....	4,591.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,598.71
Ending Balance As Of 01/31/2021	4,601.94	Average Available Balance.....	4,598.71

**DEPOSITS**

DATE	AMOUNT	DATE	AMOUNT	DATE	AMOUNT
01/11/2021	10.00				

**DAILY BALANCE INFORMATION**

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
12/31/2020	4,591.94	01/11/2021	4,601.94		

00000690-0001701-0001-0002-FIMR8003680131211257(00000690)-000001709





2414 N. Marine Blvd.  
Jacksonville, NC 28546  
910.577.3200  
www.coastalbanknc.com

Account [REDACTED]  
Page 2 of 2

**COASTAL BANK & TRUST**

DATE: 1-11-21

NAME: Conservatives for a better NC

CHECKING DEPOSIT

NET DEPOSIT \$ 10.00

01/11/2021 \$10.00

00000690-0001703-0022-0002-FIMR900690-13121125T(00000690)-000001705



ACCOUNT [REDACTED]  
 STATEMENT PERIOD 12/01/2020  
 To 12/31/2020

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
 521 NEW BRIDGE STREET  
 JACKSONVILLE, NC 28540

To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

201 3320

TYPE OF ACCOUNT... CBT Business Checking

**Summary of Activity Since Your Last Statement**

Balance Forward From 12/01/2020	4,596.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,591.94
1 Withdrawals/Deblts.....	5.00 -	Average Balance.....	4,596.94
Ending Balance As Of 12/31/2020	4,591.94	Average Available Balance.....	4,596.94

**FEE CHARGED**

DATE	AMOUNT	DESCRIPTION
12/31/2020	5.00	Dormant Account Charge

TOTAL FEES FOR THIS PERIOD

**DAILY BALANCE INFORMATION**

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
11/30/2020	4,596.94	12/31/2020	4,591.94		



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910-577-3200 • www.coastalbanknc.com

Return Service Requested

00000188-0000375-0001-0001-FIMR8003681130203339

DEC 8 2020

ACCOUNT [REDACTED]  
STATEMENT PERIOD 11/01/2020  
To 11/30/2020

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

PAGE 1 of 1

To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

TYPE OF ACCOUNT... CBT Business Checking

Summary of Activity Since Your Last Statement

Balance Forward From 11/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,596.94
1 Withdrawals/Debits.....	5.00 -	Average Balance.....	4,601.94
Ending Balance As Of 11/30/2020	4,596.94	Average Available Balance.....	4,601.94

FEEES CHARGED

DATE	AMOUNT	DESCRIPTION
11/30/2020	5.00	Dormant Account Charge

TOTAL FEES FOR THIS PERIOD

DAILY BALANCE INFORMATION

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
10/31/2020	4,601.94	11/30/2020	4,596.94		

00000188-0000375-0001-0001-FIMR8003681130203339/00000188-0000000377



ACCOUNT



STATEMENT PERIOD

10/01/2020

To

10/31/2020

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

PAGE 1 of 1

To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

TYPE OF ACCOUNT... CBT Business Checking

Summary of Activity Since Your Last Statement

Balance Forward From 10/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 10/31/2020	4,601.94	Average Available Balance.....	4,601.94

DAILY BALANCE INFORMATION

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
09/30/2020	4,601.94	10/30/2020	4,601.94		



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Return Service Requested

00000196-0000391-0001-0001-FIMR8003680930205720

OCT 13 2020

ACCOUNT [REDACTED]  
STATEMENT PERIOD 09/01/2020  
To 09/30/2020

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

PAGE 1 of 1

To report a lost or stolen debit card during non-business hours, all 1-800-500-1044.

TYPE OF ACCOUNT... CBT Business Checking [REDACTED]

Summary of Activity Since Your Last Statement

Balance Forward From 09/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 09/30/2020	4,601.94	Average Available Balance.....	4,601.94

DAILY BALANCE INFORMATION

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
08/31/2020	4,601.94	09/30/2020	4,601.94		

00000196-0000391-0001-0001-FIMR8003680930205720





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910-577-3200 • www.coastalbanknc.com

Return Service Requested

00000191-0000381-0001-0001-FIMR8003680831201378

SEP 10 2020

ACCOUNT [REDACTED]  
STATEMENT PERIOD 08/01/2020  
To 08/31/2020

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

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To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

TYPE OF ACCOUNT... CBT Business Checking [REDACTED]

Summary of Activity Since Your Last Statement

Balance Forward From 08/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 08/31/2020	4,601.94	Average Available Balance.....	4,601.94

DAILY BALANCE INFORMATION

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
07/31/2020	4,601.94	08/31/2020	4,601.94		

00000191-0000381-0001-0001-FIMR8003680831201378-000000383





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AUG 10 2020

Return Service Requested

00000166-0000331-0001-0001-FIMR8003680802207504

ACCOUNT [REDACTED]  
STATEMENT PERIOD 07/01/2020  
To 07/31/2020

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

PAGE 1 of 1

To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

TYPE OF ACCOUNT... CBT Business Checking [REDACTED]

Summary of Activity Since Your Last Statement

Balance Forward From 07/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 07/31/2020	4,601.94	Average Available Balance.....	4,601.94

DAILY BALANCE INFORMATION

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
06/30/2020	4,601.94	07/31/2020	4,601.94		

00000166-0000331-0001-0001-FIMR8003680802207504-000000001681-000000003898





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 910-577-3200 • www.coastalbanknc.com

Return Service Requested

00000182-0000363-0001-0001-FIMR8003680630203801

JUL 13 2020

ACCOUNT [REDACTED]  
 STATEMENT PERIOD 06/01/2020  
 To 06/30/2020

**CONSERVATIVES FOR A BETTER NORTH CAROLIN**  
**521 NEW BRIDGE STREET**  
**JACKSONVILLE, NC 28540**

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**Changes to Funds Availability - effective 7/1/2020:**

We are increasing the amount we make available for withdrawal by checks not subject to next day availability from \$200 to \$225. In addition, the amount available for withdrawal on exception holds for large deposits, new accounts and the amount for determining a repeat overdraft, increased from \$5,000 to \$5,525. If you have any questions regarding these changes, please contact your local branch.

**TYPE OF ACCOUNT... CBT Business Checking**

**Summary of Activity Since Your Last Statement**

Balance Forward From 06/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 06/30/2020	4,601.94	Average Available Balance.....	4,601.94

**DAILY BALANCE INFORMATION**

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
05/31/2020	4,601.94	06/30/2020	4,601.94		

00000182-0000363-0001-0001-FIMR8003680630203801-00000182-000000000000





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Return Service Requested

00000194-0000387-0001-0001-FIMR8003680531209623

JUN 8 2020

ACCOUNT [REDACTED]  
STATEMENT PERIOD 05/01/2020  
To 05/31/2020

**CONSERVATIVES FOR A BETTER NORTH CAROLIN**  
**521 NEW BRIDGE STREET**  
**JACKSONVILLE, NC 28540**

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**Changes to Funds Availability - effective 7/1/2020:**

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**TYPE OF ACCOUNT... CBT Business Checking**

**Summary of Activity Since Your Last Statement**

Balance Forward From 05/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 05/31/2020	4,601.94	Average Available Balance.....	4,601.94

**DAILY BALANCE INFORMATION**

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
04/30/2020	4,601.94	05/29/2020	4,601.94		

00000194-0000387-0001-0001-FIMR8003680531209623(00000194)-000000389





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Return Service Requested

00000204-0000407-0001-0001-FIMR8003680430206037

MAY 11 2020

ACCOUNT [REDACTED]  
STATEMENT PERIOD 04/01/2020  
To 04/30/2020

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

PAGE 1 of 1

To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

00000204-0000407-0001-0001-FIMR8003680430206037

TYPE OF ACCOUNT... CBT Business Checking [REDACTED]

Summary of Activity Since Your Last Statement

Balance Forward From 04/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 04/30/2020	4,601.94	Average Available Balance.....	4,601.94

DAILY BALANCE INFORMATION

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
03/31/2020	4,601.94	04/30/2020	4,601.94		





2414 N. Marine Blvd. • Jacksonville, NC 28546  
910-577-3200 • www.coastalbanknc.com

Return Service Requested

00000194-0000387-0001-0001-FIMR8003680331202229

APR 07 2020

ACCOUNT [REDACTED]  
STATEMENT PERIOD 03/01/2020  
To 03/31/2020

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

PAGE 1 of 1

To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

TYPE OF ACCOUNT... CBT Business Checking

Summary of Activity Since Your Last Statement

Balance Forward From 03/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 03/31/2020	4,601.94	Average Available Balance.....	4,601.94

DAILY BALANCE INFORMATION

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
02/29/2020	4,601.94	03/31/2020	4,601.94		

00000194-0000387-0001-0001-FIMR8003680331202229(00000194)-0000003889





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Return Service Requested

00000196-0000391-0001-0001-FIMR8003680301208454

MAR 09 2020

ACCOUNT [REDACTED]  
STATEMENT PERIOD 02/01/2020  
To 02/29/2020

CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

PAGE 1 of 1

To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

TYPE OF ACCOUNT... CBT Business Checking

Summary of Activity Since Your Last Statement

Balance Forward From 02/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 02/29/2020	4,601.94	Average Available Balance.....	4,601.94

DAILY BALANCE INFORMATION

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
01/31/2020	4,601.94	02/28/2020	4,601.94		

00000196-0000391-0001-0001-FIMR8003680301208454/00000196-000000393





2414 N. Marine Blvd.  
Jacksonville, NC 28546  
910-577-3200  
www.coastalbanknc.com

FEB 07 2020

ACCOUNT [REDACTED]  
STATEMENT PERIOD 01/01/2020  
To 01/31/2020

621 CONSERVATIVES FOR A BETTER NORTH CAROLIN  
521 NEW BRIDGE STREET  
JACKSONVILLE, NC 28540

PAGE 1 of 1

To report a lost or stolen debit card during non-business hours, call 1-800-500-1044.

TYPE OF ACCOUNT... CBT Business Checking [REDACTED]

Summary of Activity Since Your Last Statement

Balance Forward From 01/01/2020	4,601.94	Images Enclosed.....	0
0 Deposits/Credits.....	0 +	Minimum Balance.....	4,601.94
0 Withdrawals/Debits.....	0 -	Average Balance.....	4,601.94
Ending Balance As Of 01/31/2020	4,601.94	Average Available Balance.....	4,601.94

DAILY BALANCE INFORMATION

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
12/31/2019	4,601.94	01/31/2020	4,601.94		



**Sara A. Hendricks**

**From:** noreply-efiling@fec.gov  
**Sent:** Sunday, February 14, 2021 11:10 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: February Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES *- of -* AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/14/2021 04:09:47 PM, and was assigned the Filing ID: FEC-1499899

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** February Monthly

**From/through:** 01/01/2021 - 01/31/2021

**Filing software/version:** FECfile/8.3.0.2(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/TRMC210214316229>

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**Sara A. Hendricks**

---

**From:** noreply-efiling@fec.gov  
**Sent:** Sunday, February 14, 2021 11:04 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: Year-End Filing - Accepted



## Federal Election Commission

UNITED STATES *- of -* AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/14/2021 04:03:47 PM, and was assigned the Filing ID: FEC-1499897

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** Year-End

**From/through:** 12/01/2020 - 12/31/2020

**Filing software/version:** FECfile/8.3.0.2(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/GMFY210214316227>

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**Sara A. Hendricks**

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**From:** noreply-efiling@fec.gov  
**Sent:** Sunday, February 14, 2021 10:30 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: December Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES - of - AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/14/2021 03:30:04 PM, and was assigned the Filing ID: FEC-1499895

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** December Monthly

**From/through:** 11/01/2020 - 11/30/2020

**Filing software/version:** FECfile/8.3.0.2(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/UNWW210214316225>

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**Sara A. Hendricks**

**From:** noreply-efiling@fec.gov  
**Sent:** Sunday, February 14, 2021 10:26 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: November Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES - of - AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/14/2021 03:25:59 PM, and was assigned the Filing ID: FEC-1499894

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** November Monthly

**From/through:** 10/01/2020 - 10/31/2020

**Filing software/version:** FECfile/8.3.0.2(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/YFTC210214316224>

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**Sara A. Hendricks**

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**From:** noreply-efiling@fec.gov  
**Sent:** Sunday, February 14, 2021 10:24 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: October Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES *- of -* AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/14/2021 03:23:35 PM, and was assigned the Filing ID: FEC-1499893

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** October Monthly

**From/through:** 09/01/2020 - 09/30/2020

**Filing software/version:** FECfile/8.3.0.2(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/IJYK210214316223>

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**Sara A. Hendricks**

---

**From:** noreply-efiling@fec.gov  
**Sent:** Sunday, February 14, 2021 10:22 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: September Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES *- of -* AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/14/2021 03:21:47 PM, and was assigned the Filing ID: FEC-1499892

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** September Monthly

**From/through:** 08/01/2020 - 08/31/2020

**Filing software/version:** FECfile/8.3.0.2(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/ETDQ210214316222>

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**Sara A. Hendricks**

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**From:** noreply-efiling@fec.gov  
**Sent:** Sunday, February 14, 2021 10:21 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: August Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES *- of -* AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/14/2021 03:20:28 PM, and was assigned the Filing ID: FEC-1499891

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** August Monthly

**From/through:** 07/01/2020 - 07/31/2020

**Filing software/version:** FECfile/8.3.0.2(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/UNEW210214316221>

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**Sara A. Hendricks**

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**From:** noreply-efiling@fec.gov  
**Sent:** Sunday, February 14, 2021 10:19 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: July Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES - *of* - AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/14/2021 03:18:42 PM, and was assigned the Filing ID: FEC-1499890

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** July Monthly

**From/through:** 06/01/2020 - 06/30/2020

**Filing software/version:** FECfile/8.3.0.2(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/XCBY210214316220>

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**Sara A. Hendricks**

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**From:** noreply-efiling@fec.gov  
**Sent:** Sunday, February 14, 2021 10:16 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: June Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES - of - AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/14/2021 03:15:48 PM, and was assigned the Filing ID: FEC-1499889

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** June Monthly

**From/through:** 05/01/2020 - 05/31/2020

**Filing software/version:** FECfile/8.3.0.2(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/JTQP210214316219>

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**Sara A. Hendricks**

**From:** noreply-efiling@fec.gov  
**Sent:** Friday, May 22, 2020 9:12 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: May Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES *- of -* AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 05/22/2020 01:11:47 PM, and was assigned the Filing ID: FEC-1408124

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** May Monthly

**From/through:** 04/01/2020 - 04/30/2020

**Filing software/version:** FECfile/8.3.0.0(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/WBWI200522203058>

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**Sara A. Hendricks**

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**From:** noreply-efiling@fec.gov  
**Sent:** Wednesday, April 8, 2020 8:21 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: April Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES — *of* — AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 04/08/2020 12:20:37 PM, and was assigned the Filing ID: FEC-1393995

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** April Monthly

**From/through:** 03/01/2020 - 03/31/2020

**Filing software/version:** FECfile/8.3.0.0(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/VEFM200408184894>

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**Sara A. Hendricks**

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**From:** noreply-efiling@fec.gov  
**Sent:** Wednesday, April 8, 2020 8:08 AM  
**To:** Sara A. Hendricks  
**Subject:** FEC: March Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES — of — AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 04/08/2020 12:07:32 PM, and was assigned the Filing ID: FEC-1393985

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** March Monthly

**From/through:** 02/01/2020 - 02/29/2020

**Filing software/version:** FECfile/8.3.0.0(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/UEOK200408184883>

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Sara A. Hendricks

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**From:** noreply-efiling@fec.gov  
**Sent:** Friday, February 21, 2020 12:27 PM  
**To:** Sara A. Hendricks  
**Subject:** FEC: February Monthly Filing - Accepted



## Federal Election Commission

UNITED STATES — of — AMERICA

### FEC electronic filing results

Your filing was received and accepted by our system on 02/21/2020 05:27:19 PM, and was assigned the Filing ID: FEC-1385515

**Committee ID:** C00702324

**Committee name:** CONSERVATIVES FOR A BETTER NORTH CAROLINA

**Form type:** F3XN (New Report)

**Schedule:** February Monthly

**From/through:** 01/01/2020 - 01/31/2020

**Filing software/version:** FECfile/8.3.0.0(f32)

Review your validation warnings:

<https://efoservices.fec.gov/webcheck/services/results/AGSH200221174617>

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 1, 2021

**REVIEWING OFFICER RECOMMENDATION  
OFFICE OF ADMINISTRATIVE REVIEW (“OAR”)**

AF# 3853, AF# 3908, AF# 3919, AF# 3927, AF# 4011, and AF# 4015 – Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer (C00702324)

**Summary of Recommendations**

Make a final determination in AF# 3853, AF# 3908, AF# 3919, AF# 3927, AF# 4011, and AF# 4015 that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalties.

**Reason-to-Believe Background**

The 2020 June Monthly Report was due on June 20, 2020. The Committee filed the report on February 14, 2021, 239 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1). On January 8, 2021, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 June Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated February 4, 2021 was sent to the respondents’ email address of record by the Reports Analysis Division (“RAD”) to notify them of the Commission’s RTB finding and civil money penalty.

The 2020 July Monthly Report was due on July 20, 2020. The Committee filed the report on February 14, 2021, 209 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1). On January 8, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 July Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated January 25, 2021 was sent to the respondents’ email address of record by RAD to notify them of the Commission’s RTB finding and civil money penalty.

The 2020 August Monthly Report was due on August 20, 2020. The Committee filed the report on February 14, 2021, 178 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1). On January 8, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 August Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated February 4, 2021

was sent to the respondents' email address of record by RAD to notify them of the Commission's RTB finding and civil money penalty.

The 2020 September Monthly Report was due on September 20, 2020. The Committee filed the report on February 14, 2021, 147 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1). On January 7, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 September Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated February 4, 2021 was sent to the respondents' email address of record by RAD to notify them of the Commission's RTB finding and civil money penalty.

The 2020 October Monthly Report was due on October 20, 2020. The Committee filed the report on February 14, 2021, 117 days late. The report is election sensitive and was not filed prior to four days before the general election; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). On January 8, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 October Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$834 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated February 4, 2021 was sent to the respondents' email address of record by RAD to notify them of the Commission's RTB finding and civil money penalty.

The 2020 Pre-General Report was due on October 22, 2020. The Committee filed the 2020 November Monthly Report disclosing activity for the 2020 Pre-General Report coverage period on February 14, 2021, 115 days late. The report is election sensitive and was not filed prior to four days before the general election; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(2). On January 7, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 Pre-General Report. The Commission also made a preliminary determination that the civil money penalty was \$834 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter dated February 9, 2021 was sent to the respondents' email address of record by RAD to notify them of the Commission's RTB finding and civil money penalty.

## **Legal Requirements**

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee not authorized by a candidate which is filing on a monthly basis in an election year shall file a monthly report no later than 20 days after the last day of the month. In lieu of a November Monthly Report in any year in which there is a regularly scheduled general election, a pre-election report shall be filed no later than 12 days before the general election. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(3). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

## Respondents' Challenges

On February 16, 2021, the Commission received the written response (“challenge”) from the Treasurer for AF# 3853, AF# 3908, AF# 3919, AF# 3927, AF# 4011, and AF# 4015. The Treasurer states the Committee has had no recent activity and requests the Commission forgive the penalties. She further explains, in part:

The reports were not filed timely due to Covid-19. We were working part time from April-May and then June 1, 2020 I was furloughed, and the office closed. Starting this past week, February 8-12, 2021, we have been brought back in stages and since coming back, all reports have been filed.

## Analysis

The Treasurer indicates the reports were not timely filed due to staffing impacts of COVID-19. In accordance with 11 C.F.R. § 111.35, 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) demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond the respondents’ control. The “best efforts” defense is a two-part test: the respondents used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control, and they filed the report no later than 24 hours after the end of these circumstances.

The Commission states in its *Explanation and Justification for Revised 11 CFR § 111.35(b)(3) – “Best Efforts” Defense*, 72 Fed. Reg. 14662, 14664-14666 (Mar. 29, 2007) that respondents must show

...that the reasonably unforeseen circumstances in fact *prevented* the timely and proper filing of the required report...[T]his rule requires a strict causal relationship between the circumstances described in the challenge...and the respondent's inability to file the report timely. It is not sufficient for reasonably unforeseen circumstances to make it merely more difficult than usual for the respondent to file on time. The circumstance must cause the respondent to be *unable* to file in a timely and proper manner, despite the respondent attempting to use all available methods of filing. (emphasis included)

The Reviewing Officer acknowledges the combination of office closures and reduced staffing may have impacted the Committee’s normal operations. However, the respondents did not demonstrate that the unforeseen circumstances directly *prevented* the respondents from filing the reports prior to the filing deadlines. Nor did the respondents demonstrate that they filed the reports no later than 24 hours after the end of a circumstance considered to be unforeseen and beyond the respondents’ control. Therefore, the “best efforts” defense does not succeed. Further, unavailability of committee staff is specifically included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents’ control. Therefore, the Reviewing Officer recommends that the Commission make a final

determination that the respondents violated 52 U.S.C. § 30104(a) in AF# 3853, AF# 3908, AF# 3919, AF# 3927, AF# 4011, and AF# 4015.

At the time of the RTB findings, the Commission used an estimated level of activity (\$7,723) to calculate the penalties because the reports had not yet been filed. 11 C.F.R § 111.43(d)(2)(i). On February 14, 2021, the Committee filed the 2020 June Monthly, 2020 July Monthly, 2020 August Monthly, 2020 September Monthly, 2020 October Monthly, and 2020 November Monthly<sup>1</sup> Reports. Each of the reports discloses \$0 in total receipts and \$0 in total disbursements during each of the reporting periods. Therefore, the actual level of activity for the 2020 June Monthly, 2020 July Monthly, 2020 August Monthly, 2020 September Monthly, 2020 October Monthly, and 2020 Pre-General reporting periods is \$0. 11 C.F.R § 111.43(d)(3)(ii). Using the schedules of penalties at 11 C.F.R § 111.43, no civil money penalty should be assessed for a level of activity of \$0.

The Reviewing Officer recommends that the Commission make a final determination in AF# 3853, AF# 3908, AF# 3919, AF# 3927, AF# 4011, and AF# 4015 that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalties.

### **OAR Recommendations**

- (1) Adopt the Reviewing Officer recommendation for AF# 3853 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 3853 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417);
- (3) Adopt the Reviewing Officer recommendation for AF# 3908 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (4) Make a final determination in AF# 3908 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417);
- (5) Adopt the Reviewing Officer recommendation for AF# 3919 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (6) Make a final determination in AF# 3919 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417);

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<sup>1</sup> The Committee's 2020 November Monthly Report included the 2020 Pre-General Report coverage period of 10/1/20 – 10/14/20.

- (7) Adopt the Reviewing Officer recommendation for AF# 3927 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (8) Make a final determination in AF# 3927 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417);
- (9) Adopt the Reviewing Officer recommendation for AF# 4011 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (10) Make a final determination in AF# 4011 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$834);
- (11) Adopt the Reviewing Officer recommendation for AF# 4015 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (12) Make a final determination in AF# 4015 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$834);
- (13) Send the appropriate letters.

### **Attachments**

Attachment 1 –

Attachment 2 – Declaration from RAD

Attachment 3 – Declaration from OAR

**DECLARATION OF KRISTIN D. ROSER**

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission (“Commission”). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Conservatives for a Better North Carolina:
  - A) Non-Filer Letter, dated July 7, 2020, referencing the 2020 June Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com);
  - B) Non-Filer Letter, dated August 5, 2020, referencing the 2020 July Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com);
  - C) Non-Filer Letter, dated September 8, 2020, referencing the 2020 August Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com);
  - D) Non-Filer Letter, dated October 6, 2020, referencing the 2020 September Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com);
  - E) Non-Filer Letter, dated November 5, 2020, referencing the 2020 October Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com);
  - F) Non-Filer Letter, dated November 6, 2020, referencing the 2020 12 Day Pre-General Report (sent via electronic mail to: shendricks@platinumcorral.com);
  - G) Reason-to-Believe Letter, dated February 4, 2021, referencing the 2020 June Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com).

- H) Reason-to-Believe Letter, dated January 25, 2021, referencing the 2020 July Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com).
  - I) Reason-to-Believe Letter, dated February 4, 2021, referencing the 2020 August Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com).
  - J) Reason-to-Believe Letter, dated February 4, 2021, referencing the 2020 September Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com).
  - K) Reason-to-Believe Letter, dated February 4, 2021, referencing the 2020 October Monthly Report (sent via electronic mail to: shendricks@platinumcorral.com).
  - L) Reason-to-Believe Letter, dated February 9, 2021, referencing the 2020 12 Day Pre-General Report (sent via electronic mail to: shendricks@platinumcorral.com).
4. I hereby certify that I have searched the Commission's public records and find that Conservatives for a Better North Carolina filed the 2020 June Monthly Report, 2020 July Monthly Report, 2020 August Monthly Report, 2020 September Monthly Report, and the 2020 October Monthly Report on February 14, 2021. In addition, Conservatives for a Better North Carolina filed a 2020 November Monthly Report, covering the 2020 12 Day Pre-General reporting period from October 1, 2020 through October 14, 2020, with the Commission on February 14, 2021.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed on the 4<sup>th</sup> day of March, 2021.

*Kristin D. Roser*

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Kristin D. Roser  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

September 8, 2020

HENDRICKS, SARA, TREASURER  
CONSERVATIVES FOR A BETTER NORTH CAROLINA  
521 NEW BRIDGE ST  
JACKSONVILLE, NC 28540

IDENTIFICATION NUMBER: C00702324

REFERENCE: AUGUST MONTHLY REPORT (07/01/2020 - 07/31/2020)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. 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. Reports sent by registered mail, overnight delivery, or certified mail, are considered filed with the FEC as of the date of the postmark. Reports submitted by first-class mail will be considered filed when actually received by Commission staff, subject to delays resulting from the agency's limited mail processing. The Commission will not be able to receive, or process reports filed by courier service during Phase I. The FEC does not have statutory authority to extend filing deadlines, but it may choose not to pursue administrative fines against filers prevented from filing by reasonably unforeseen circumstances beyond their control.

Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at [www.fec.gov](http://www.fec.gov).

The failure to timely file this report may result in civil money penalties, suspension of matching funds payments, an audit or legal enforcement action. The civil money penalty

## CONSERVATIVES FOR A BETTER NORTH CAROLINA

Page 2 of 2

calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Jamie Sikorsky in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1137.

Sincerely,



Deborah Chacona  
Assistant Staff Director  
Reports Analysis Division

250

## DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission (“Commission”). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A political committee not authorized by a candidate which is filing on a monthly basis in an election year shall file a June Monthly Report by June 20, a July Monthly Report by July 20, an August Monthly Report by August 20, a September Monthly Report by September 20, an October Monthly Report by October 20, and a Pre-General Report by the 12<sup>th</sup> day before the general election. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on June 20, 2020 for the 2020 June Monthly Report to be timely filed, July 20, 2020 for the 2020 July Monthly Report to be timely filed, August 20, 2020 for the 2020 August Monthly Report to be timely filed, September 20, 2020 for the 2020 September Monthly Report to be timely filed, October 20, 2020 for the 2020 October Monthly Report to be timely filed, and October 22, 2020 for the 2020 Pre-General Report to be timely filed.
- 3) I hereby certify that I have searched the Commission’s public records and that the documents identified herein are the true and accurate copies of:
  - a) Cover and Summary pages of the 2020 June Monthly Report filed by Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer. The report includes the coverage period of May 1 through May 31, 2020 and was electronically filed on February 14, 2021.
  - b) Cover and Summary pages of the 2020 July Monthly Report filed by Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer. The report includes the coverage period of June 1 through June 30, 2020 and was electronically filed on February 14, 2021.
  - c) Cover and Summary pages of the 2020 August Monthly Report filed by Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer. The report includes the coverage period of July 1 through July 31, 2020 and was electronically filed on February 14, 2021.
  - d) Cover and Summary pages of the 2020 September Monthly Report filed by Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer. The report includes the coverage period of August 1 through August 31, 2020 and was electronically filed on February 14, 2021.
  - e) Cover and Summary pages of the 2020 October Monthly Report filed by Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer. The report includes the coverage period of September 1 through September 30, 2020 and was electronically filed on February 14, 2021.

- f) Cover and Summary pages of the 2020 November Monthly Report filed by Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer. The report includes the coverage period of October 1 through October 31, 2020 and was electronically filed on February 14, 2021.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on the 1<sup>st</sup> day of April, 2021.

*Rhiannon Magruder*  
Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

# FEC FORM 3X

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. **12FE4M5**  
**CONSERVATIVES FOR A BETTER NORTH CAROLINA**

ADDRESS (number and street) **521 NEW BRIDGE ST**  
Check if different than previously reported. (ACC) **JACKSONVILLE NC 28540**

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

**C** **C00702324** 3. IS THIS REPORT  NEW (N) OR  AMENDED (A)

4. TYPE OF REPORT (Choose One)  
(a) Quarterly Reports:  
 April 15 Quarterly Report (Q1)  
 July 15 Quarterly Report (Q2)  
 October 15 Quarterly Report (Q3)  
 January 31 Year-End Report (YE)  
 July 31 Mid-Year Report (Non-election Year Only) (MY)  
 Termination Report (TER)  
(b) Monthly Report Due On:  
 Feb 20 (M2)  May 20 (M5)  Aug 20 (M8)  Nov 20 (M11) (Non-Election Year Only)  
 Mar 20 (M3)  Jun 20 (M6)  Sep 20 (M9)  Dec 20 (M12) (Non-Election Year Only)  
 Apr 20 (M4)  Jul 20 (M7)  Oct 20 (M10)  Jan 31 (YE)  
(c) 12-Day PRE-Election Report for the:  
 Primary (12P)  General (12G)  Runoff (12R)  
 Convention (12C)  Special (12S)  
Election on  /  /  in the State of   
(d) 30-Day POST-Election Report for the:  
 General (30G)  Runoff (30R)  Special (30S)  
Election on  /  /  in the State of

5. Covering Period   /   /    through   /   /

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
Type or Print Name of Treasurer **HENDRICKS, SARA, , ,**

Signature of Treasurer **HENDRICKS, SARA, , ,** [Electronically Filed] Date   /   /

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

**SUMMARY PAGE  
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

**CONSERVATIVES FOR A BETTER NORTH CAROLINA**

Report Covering the Period: From:  /  /  To:  /  /

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <input type="text" value="2020"/>		4601.94
(b) Cash on Hand at Beginning of Reporting Period.....	4601.94	
(c) Total Receipts (from Line 19) .....	0.00	0.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) .....	4601.94	4601.94
7. Total Disbursements (from Line 31) .....	0.00	0.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....	4601.94	4601.94
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	
10. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information contact:**

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

# FEC FORM 3X

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. **12FE4M5**  
**CONSERVATIVES FOR A BETTER NORTH CAROLINA**

ADDRESS (number and street) **521 NEW BRIDGE ST**  
Check if different than previously reported. (ACC) **JACKSONVILLE NC 28540**

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲  
**C C00702324** 3. IS THIS REPORT  NEW (N) OR  AMENDED (A)

4. TYPE OF REPORT (Choose One)  
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 July 15 Quarterly Report (Q2)  
 October 15 Quarterly Report (Q3)  
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 Termination Report (TER)  
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 Mar 20 (M3)  Jun 20 (M6)  Sep 20 (M9)  Dec 20 (M12) (Non-Election Year Only)  
 Apr 20 (M4)  Jul 20 (M7)  Oct 20 (M10)  Jan 31 (YE)  
(c) 12-Day PRE-Election Report for the:  
 Primary (12P)  General (12G)  Runoff (12R)  
 Convention (12C)  Special (12S)  
Election on [M M] / [D D] / [Y Y Y Y Y Y] in the State of [ ]  
(d) 30-Day POST-Election Report for the:  
 General (30G)  Runoff (30R)  Special (30S)  
Election on [M M] / [D D] / [Y Y Y Y Y Y] in the State of [ ]

5. Covering Period [06] / [01] / [2020] through [06] / [30] / [2020]

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
Type or Print Name of Treasurer **HENDRICKS, SARA, , ,**

Signature of Treasurer **HENDRICKS, SARA, , ,** [Electronically Filed] Date **02** / **14** / **2021**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

**SUMMARY PAGE**  
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FEC Form 3X (Rev. 05/2016)

Page 2

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(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	<input type="text" value="4601.94"/>	<input type="text" value="4601.94"/>
7. Total Disbursements (from Line 31).....	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	<input type="text" value="4601.94"/>	<input type="text" value="4601.94"/>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	<input type="text" value="0.00"/>	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	<input type="text" value="0.00"/>	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

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Check if different than previously reported. (ACC) **JACKSONVILLE NC 28540**

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

**C** **C00702324** 3. IS THIS REPORT  NEW (N) OR  AMENDED (A)

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Election on  /  /  in the State of   
(d) 30-Day POST-Election Report for the:  
 General (30G)  Runoff (30R)  Special (30S)  
Election on  /  /  in the State of

5. Covering Period   /   /    through   /   /

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
Type or Print Name of Treasurer **HENDRICKS, SARA, , ,**

Signature of Treasurer **HENDRICKS, SARA, , ,** [Electronically Filed] Date   /   /

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

**SUMMARY PAGE**  
**OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

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Write or Type Committee Name

**CONSERVATIVES FOR A BETTER NORTH CAROLINA**

Report Covering the Period: From:  /  /  To:  /  /

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(b) Cash on Hand at Beginning of Reporting Period.....	4601.94	
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(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) .....	4601.94	4601.94
7. Total Disbursements (from Line 31) .....	0.00	0.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....	4601.94	4601.94
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	
10. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information contact:**

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT Example: If typing, type over the lines. 12FE4M5 CONSERVATIVES FOR A BETTER NORTH CAROLINA

ADDRESS (number and street) 521 NEW BRIDGE ST JACKSONVILLE NC 28540

2. FEC IDENTIFICATION NUMBER C00702324 3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One) (a) Quarterly Reports: April 15, July 15, October 15, January 31, July 31 Mid-Year, Termination Report. (b) Monthly Report Due On: Feb 20, Mar 20, Apr 20, May 20, Jun 20, Jul 20, Aug 20, Sep 20, Oct 20, Nov 20, Dec 20, Jan 31. (c) 12-Day PRE-Election Report for the: Primary, General, Runoff, Convention, Special. (d) 30-Day POST-Election Report for the: General, Runoff, Special.

5. Covering Period 08/01/2020 through 08/31/2020

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete. HENDRICKS, SARA, , , Type or Print Name of Treasurer

Signature of Treasurer HENDRICKS, SARA, , , [Electronically Filed] Date 02/14/2021

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

**SUMMARY PAGE  
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

**CONSERVATIVES FOR A BETTER NORTH CAROLINA**

Report Covering the Period: From:  /  /  To:  /  /

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(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) .....	<input type="text" value="4601.94"/>	<input type="text" value="4601.94"/>
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8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....	<input type="text" value="4601.94"/>	<input type="text" value="4601.94"/>
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	<input type="text" value="0.00"/>	
10. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	<input type="text" value="0.00"/>	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information contact:**

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

# FEC FORM 3X

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. **12FE4M5**  
CONSERVATIVES FOR A BETTER NORTH CAROLINA

ADDRESS (number and street) 521 NEW BRIDGE ST  
Check if different than previously reported. (ACC) JACKSONVILLE NC 28540

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

**C** C00702324 3. IS THIS REPORT  NEW (N) OR  AMENDED (A)

### 4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

- (b) Monthly Report Due On:
- |                                      |                                      |  |  |
|--------------------------------------|--------------------------------------|--|--|
| <input type="checkbox"/> Feb 20 (M2) | <input type="checkbox"/> May 20 (M5) | <input type="checkbox"/> Aug 20 (M8)             | <input type="checkbox"/> Nov 20 (M11) (Non-Election Year Only) |
| <input type="checkbox"/> Mar 20 (M3) | <input type="checkbox"/> Jun 20 (M6) | <input type="checkbox"/> Sep 20 (M9)             | <input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only) |
| <input type="checkbox"/> Apr 20 (M4) | <input type="checkbox"/> Jul 20 (M7) | <input checked="" type="checkbox"/> Oct 20 (M10) | <input type="checkbox"/> Jan 31 (YE)                           |

- (c) 12-Day PRE-Election Report for the:
- |   |  |                                       |
|---|--|---------------------------------------|
| <input type="checkbox"/> Primary (12P)    | <input type="checkbox"/> General (12G) | <input type="checkbox"/> Runoff (12R) |
| <input type="checkbox"/> Convention (12C) | <input type="checkbox"/> Special (12S) |                                       |

Election on [M M] / [D D] / [Y Y Y Y] in the State of [ ]

- (d) 30-Day POST-Election Report for the:
- |  |                                       |  |
|--|---------------------------------------|--|
| <input type="checkbox"/> General (30G) | <input type="checkbox"/> Runoff (30R) | <input type="checkbox"/> Special (30S) |
|--|---------------------------------------|--|

Election on [M M] / [D D] / [Y Y Y Y] in the State of [ ]

5. Covering Period [09] / [01] / [2020] through [09] / [30] / [2020]

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.  
HENDRICKS, SARA, , ,  
Type or Print Name of Treasurer

Signature of Treasurer HENDRICKS, SARA, , , [Electronically Filed] Date [02] / [14] / [2021]

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

**SUMMARY PAGE**  
**OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

**CONSERVATIVES FOR A BETTER NORTH CAROLINA**

Report Covering the Period: From:  /  /  To:  /  /

	<b>COLUMN A This Period</b>	<b>COLUMN B Calendar Year-to-Date</b>
6. (a) Cash on Hand January 1, <input type="text" value="2020"/>		<input type="text" value="4601.94"/>
(b) Cash on Hand at Beginning of Reporting Period.....	<input type="text" value="4601.94"/>	
(c) Total Receipts (from Line 19) .....	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) .....	<input type="text" value="4601.94"/>	<input type="text" value="4601.94"/>
7. Total Disbursements (from Line 31) .....	<input type="text" value="0.00"/>	<input type="text" value="0.00"/>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....	<input type="text" value="4601.94"/>	<input type="text" value="4601.94"/>
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	<input type="text" value="0.00"/>	
10. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	<input type="text" value="0.00"/>	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information contact:**

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100

# FEC FORM 3X

# REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

CONSERVATIVES FOR A BETTER NORTH CAROLINA

ADDRESS (number and street) 521 NEW BRIDGE ST

Check if different than previously reported. (ACC)

JACKSONVILLE NC 28540

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C 00702324  NC 28540

3. IS THIS REPORT  NEW (N) OR  AMENDED (A)

## 4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

- (b) Monthly Report Due On:
- |                                      |                                      |                                       |   |
|--------------------------------------|--------------------------------------|---------------------------------------|---|
| <input type="checkbox"/> Feb 20 (M2) | <input type="checkbox"/> May 20 (M5) | <input type="checkbox"/> Aug 20 (M8)  | <input checked="" type="checkbox"/> Nov 20 (M11) (Non-Election Year Only) |
| <input type="checkbox"/> Mar 20 (M3) | <input type="checkbox"/> Jun 20 (M6) | <input type="checkbox"/> Sep 20 (M9)  | <input type="checkbox"/> Dec 20 (M12) (Non-Election Year Only)            |
| <input type="checkbox"/> Apr 20 (M4) | <input type="checkbox"/> Jul 20 (M7) | <input type="checkbox"/> Oct 20 (M10) | <input type="checkbox"/> Jan 31 (YE)                                      |

- (c) 12-Day PRE-Election Report for the:
- |   |  |                                       |
|---|--|---------------------------------------|
| <input type="checkbox"/> Primary (12P)    | <input type="checkbox"/> General (12G) | <input type="checkbox"/> Runoff (12R) |
| <input type="checkbox"/> Convention (12C) | <input type="checkbox"/> Special (12S) |                                       |

Election on M M / D D / Y Y Y Y Y Y in the State of

- (d) 30-Day POST-Election Report for the:
- |  |                                       |  |
|--|---------------------------------------|--|
| <input type="checkbox"/> General (30G) | <input type="checkbox"/> Runoff (30R) | <input type="checkbox"/> Special (30S) |
|--|---------------------------------------|--|

Election on M M / D D / Y Y Y Y Y Y in the State of

5. Covering Period M M / D D / Y Y Y Y Y Y 10 / 01 / 2020 through M M / D D / Y Y Y Y Y Y 10 / 31 / 2020

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

HENDRICKS, SARA, , ,

Type or Print Name of Treasurer

Signature of Treasurer HENDRICKS, SARA, , , [Electronically Filed] Date M M / D D / Y Y Y Y Y Y 02 / 14 / 2021

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office Use Only									
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FEC FORM 3X  
Rev. 05/2016

**SUMMARY PAGE**  
**OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

**CONSERVATIVES FOR A BETTER NORTH CAROLINA**

Report Covering the Period: From:  /  /  To:  /  /

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <input type="text" value="2020"/>		4601.94
(b) Cash on Hand at Beginning of Reporting Period.....	4601.94	
(c) Total Receipts (from Line 19) .....	0.00	0.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) .....	4601.94	4601.94
7. Total Disbursements (from Line 31) .....	0.00	0.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) .....	4601.94	4601.94
9. Debts and Obligations Owed <b>TO</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	
10. Debts and Obligations Owed <b>BY</b> the Committee (Itemize all on Schedule C and/or Schedule D) .....	0.00	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

**For further information contact:**

Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Toll Free 800-424-9530  
Local 202-694-1100



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 2, 2021

Sara Hendricks, in her official capacity as Treasurer  
Conservatives for a Better North Carolina  
521 New Bridge Street  
Jacksonville, NC 28540

C00702324

AF# 3853, AF# 3908, AF# 3919, AF# 3927, AF# 4011, and AF# 4015

Dear Ms. Hendricks:

On January 8, 2021, the Commission found reason to believe (“RTB”) that Conservatives for a Better America and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 June Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43.

On January 8, 2021, the Commission found RTB that Conservatives for a Better America and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 July Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43.

On January 8, 2021, the Commission found RTB that Conservatives for a Better America and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 August Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43.

On January 7, 2021, the Commission found RTB that Conservatives for a Better America and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 September Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43.

On January 8, 2021, the Commission found RTB that Conservatives for a Better America and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 October Monthly Report. The Commission also made a preliminary determination that the civil money penalty was \$834 based on the schedule of penalties at 11 C.F.R. § 111.43.

On January 7, 2021, the Commission found RTB that Conservatives for a Better America and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 Pre-General Report. The Commission also made a preliminary determination that the civil money penalty was \$834 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess no civil money penalties. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Please note, the agency's offices 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, if you choose to submit a response to the recommendation, it 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 the Commission Secretary at [secretary@fec.gov](mailto:secretary@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 responses will be deemed received on the date it is electronically received by staff. Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

*Rhiannon Magruder*

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review

**RECEIVED**

By Office of the Commission Secretary at 10:47 am, Apr 13, 2021

**SENSITIVE**FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 13, 2021

**MEMORANDUM**

To: The Commission

Through: Alec Palmer *AP*  
Staff Director

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

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3853, AF# 3908, AF# 3919, AF# 3927, AF# 4011, and AF# 4015 – Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer (C00702324)

On January 8, 2021, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 June Monthly Report and made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43 (AF# 3853). On January 8, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 July Monthly Report and made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43 (AF# 3908). On January 8, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 August Monthly Report and made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43 (AF# 3919). On January 7, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 September Monthly Report and made a preliminary determination that the civil money penalty was \$417 based on the schedule of penalties at 11 C.F.R. § 111.43 (AF# 3927). On January 8, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 October Monthly Report and made a preliminary determination that the civil money penalty was \$834 based on the schedule of penalties at 11 C.F.R. § 111.43 (AF# 4011). On January 7, 2021, the Commission found RTB that the respondents violated 52 U.S.C. § 30104(a) for failing to timely

file the 2020 Pre-General Report and made a preliminary determination that the civil money penalty was \$834 based on the schedule of penalties at 11 C.F.R. § 111.43 (AF# 4015).

On February 16, 2021, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated April 1, 2021 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination in AF# 3853, AF# 3908, AF# 3919, AF# 3927, AF# 4011, and AF# 4015 that the respondents violated 52 U.S.C. § 30104(a) and assess no civil money penalties.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). The respondents have since indicated they will not be submitting a response to the ROR.

### **OAR Recommendations**

- (1) Adopt the Reviewing Officer recommendation for AF# 3853 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 3853 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417);
- (3) Adopt the Reviewing Officer recommendation for AF# 3908 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (4) Make a final determination in AF# 3908 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417);
- (5) Adopt the Reviewing Officer recommendation for AF# 3919 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (6) Make a final determination in AF# 3919 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417);
- (7) Adopt the Reviewing Officer recommendation for AF# 3927 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;

- (8) Make a final determination in AF# 3927 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417);
- (9) Adopt the Reviewing Officer recommendation for AF# 4011 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (10) Make a final determination in AF# 4011 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$834);
- (11) Adopt the Reviewing Officer recommendation for AF# 4015 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination;
- (12) Make a final determination in AF# 4015 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$834);  
and
- (13) Send the appropriate letters.

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) AFs 3853, 3908, 3919, 3927, 4011 and  
 Final Determination Recommendation: ) 4015  
 Conservatives for a Better North Carolina )  
 and Sara Hendricks, in her official )  
 capacity as Treasurer (C00702324) )

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 21, 2021, the Commission decided by a vote of 5-0 to take the following actions in AFs 3853, 3908, 3919, 3927, 4011 and 4015:

1. Adopt the Reviewing Officer recommendation for AF# 3853 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 3853 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417).
3. Adopt the Reviewing Officer recommendation for AF# 3908 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination.
4. Make a final determination in AF# 3908 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417).
5. Adopt the Reviewing Officer recommendation for AF# 3919 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination.

Federal Election Commission  
AFs 3853, 3908, 3919, 3927, 4011 and 4015  
April 21, 2021

6. Make a final determination in AF# 3919 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417).
7. Adopt the Reviewing Officer recommendation for AF# 3927 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination.
8. Make a final determination in AF# 3927 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$417).
9. Adopt the Reviewing Officer recommendation for AF# 4011 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination.
10. Make a final determination in AF# 4011 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$834).
11. Adopt the Reviewing Officer recommendation for AF# 4015 involving Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, in making the final determination.
12. Make a final determination in AF# 4015 that Conservatives for a Better North Carolina and Sara Hendricks, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess no civil money penalty (reduced from the RTB civil money penalty of \$834).
13. Send the appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, and Weintraub

voted affirmatively for the decision. Commissioner Walther did not vote.

Federal Election Commission  
AFs 3853, 3908, 3919, 3927, 4011 and 4015  
April 21, 2021



Attest:

**Laura  
Sinram**

Digitally signed by  
Laura Sinram  
Date: 2021.04.22  
13:13:34 -04'00'

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Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 7, 2021

Sara Hendricks, in official capacity as Treasurer  
Conservatives for a Better North Carolina  
521 New Bridge St  
Jacksonville, NC 28540

C00702324  
AF# 3919

Dear Ms. Hendricks:

On January 8, 2021, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Conservatives for a Better North Carolina and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2020 August Monthly Report. By letter dated February 4, 2021, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$417 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On February 16, 2021, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission’s RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission reduce the RTB civil money penalty because it was calculated using an estimated level of activity, make a final determination that Conservatives for a Better North Carolina and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the actual level of activity disclosed on the 2020 August Monthly Report filed February 14, 2021 (\$0), assess no civil money penalty in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on April 2, 2021.

On April 21, 2021, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Conservatives for a Better North Carolina and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the level of activity disclosed on the 2020 August Monthly Report (\$0), assessed no civil money penalty (reduced from the RTB civil money penalty of \$417). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual rather than the estimated level of activity was used. A copy of the Final Determination Recommendation is attached.

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

If you have any questions regarding this matter, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

A handwritten signature in black ink, appearing to read "Shana M. Broussard". The signature is written in a cursive, flowing style.

Shana M. Broussard  
Chair

Attachment