



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 October Quarterly Report (Election Sensitive) for the Administrative
Fine Program

We are withdrawing the document circulated to the Commission on December 4, 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.

On December 16, 2020, Campaign to Support the President (AF 3937) filed a 2020 October Quarterly Report that disclosed a level of activity lower than previously estimated. The circulation report has been updated to reflect the updated level of activity and resulting civil money penalty.

Attached is a list of political committees and their treasurers who failed to file the 2020 October Quarterly Report (Election Sensitive) in accordance with 52 U.S.C. § 30104(a). The October Quarterly Report was due on October 15, 2020.

Under the Administrative Fine Program, the October Quarterly Report is considered an election-sensitive filing for authorized committees supporting candidates involved in the general election as well as all unauthorized committees. For the committees listed on the attached RTB Circulation Report, the October Quarterly Report was an election-sensitive filing. The committees either filed the report after the due date, failed to file the report or failed to file the report prior to four (4) days before the general election (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 included on the attached 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 OCTOBER QUARTERLY Election Sensitive 10/15/2020 H_S_P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3932	C00730341	800DEMOCRAT		MITCHELL RUBIN	\$201,547	0	10/27/2020	12	\$45,654	\$877
3933	C00687657	AMERICAN PRO-ISRAEL PAC		JEANNE SULLIVAN	\$137,162	0		Not Filed	\$137,162 (est)	\$7,395
3934	C00246421	ASSOCIATION OF PROFESSIONAL FLIGHT ATTENDANTS (APFA PAC) POLITICAL ACTION COMMITTEE		CRAIG GUNTER	\$130,766	0	10/22/2020	7	\$35,678	\$697
3935	C00723270	BRAD BARRON FOR US SENATE	STEPHEN BRADLEY BARRON	JILL M. BARRON	\$128,789	0		Not Filed	\$128,789 (est)	\$7,395
3936	C00727065	BRONX UNITED		RUSH PEREZ	\$111,675	0		Not Filed	\$37,225 (est)	\$1,947
3937	C00697862	CAMPAIGN TO SUPPORT THE PRESIDENT		MATT TUNSTALL	\$367,176	0	12/16/2020	Not Filed*	\$37,694	\$1,947

3939	C00034066	DISTRICT 1199C NAT'L UNION OF HOSPITAL & HEALTH CARE EMPLOYEES POLITICAL ACTION FUND		SALIMA PACE	\$109,766	0	11/9/2020	Not Filed*	\$26,064	\$1,947
3940	C00717025	EMILY ROBINSON FOR CONGRESS	EMILY ROBINSON	EMILY ROBINSON	\$240,480	0		Not Filed	\$120,240 (est)	\$7,395

3942	C00385740	FROZEN FOOD POLITICAL ACTION COMMITTEE		THOMAS KEARNEY	\$111,346	0	10/22/2020	7	\$8,320	\$230
3943	C00721886	HOMETOWN VALUES PAC		FRANCIS XAVIER HELGESEN	\$127,887	0		Not Filed	\$42,629 (est)	\$1,947

3945	C00675546	JANICEK FOR SENATE	CHRIS EDWARD JANICEK	MARK THOMAS NIELSEN	\$282,688	0	10/28/2020	13	\$35,325	\$913
3946	C00697128	OUR EVERYDAY PAC	ROBERT ALEX EMMONS	ROBERT EMMONS	\$239,917	0		Not Filed	\$34,274 (est)	\$1,947
3947	C00726224	PEOPLE4AMERICA FEDERAL COMMITTEE		BRIAN HERMAN	\$334,134	0	10/24/2020	9	\$156,998	\$3,764
3948	C00731380	ROB ANDERSON FOR LOUISIANA	ROBERT JON ANDERSON	ROBERT JON ANDERSON	\$111,632	0		Not Filed	\$55,816 (est)	\$4,437

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3949	C00359984	SOUTHEAST MILK INC POLITICAL ACTION COMMITTEE		TODD PROFFITT	\$100,151	0	10/22/2020	7	\$559	\$160
3950	C00688069	SUPPORT AMERICAN LEADERS PAC		MATTHEW NELSON TUNSTALL	\$3,075,481	0	11/24/2020	Not Filed*	\$594,723	\$17,748
3951	C00522458	TOGETHER WE THRIVE		CHRISTOPHER ZULLO	\$417,802	0		Not Filed	\$104,451 (est)	\$7,395
3952	C00616912	WOMEN VOTE SMART		AMY S. KREMER	\$291,231	0		Not Filed	\$145,616 (est)	\$7,395

* The committee did not file their report prior to four (4) days before the general election; therefore, per 11 C.F.R. 111.43(e), the report is considered to be not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Withdrawal and Resubmission of Reason)	
To Believe Recommendation – 2020)	
October Quarterly Report (Election)	
Sensitive) for the Administrative Fine)	
Program:)	
800DEMOCRAT, and RUBIN,)	AF# 3932
MITCHELL as treasurer;)	
AMERICAN PRO-ISRAEL PAC, and)	AF# 3933
SULLIVAN, JEANNE as treasurer;)	
ASSOCIATION OF PROFESSIONAL)	AF# 3934
FLIGHT ATTENDANTS (APFA PAC))	
POLITICAL ACTION COMMITTEE, and)	
CRAIG GUNTER as treasurer;)	
BRAD BARRON FOR US SENATE, and)	AF# 3935
BARRON, JILL M BARRON as treasurer;)	
BRONX UNITED, and PEREZ, RUSH as)	AF# 3936
treasurer;)	
CAMPAIGN TO SUPPORT THE)	AF# 3937
PRESIDENT, and TUNSTALL, MATT as)	
treasurer;)	
DISTRICT 1199C NAT'L UNION OF)	AF# 3939
HOSPITAL & HEALTH CARE)	
EMPLOYEES POLITICAL ACTION)	
FUND, and SALIMA PACE as treasurer;)	
EMILY ROBINSON FOR CONGRESS,)	AF# 3940
and ROBINSON. EMILY as treasurer:)	
FROZEN FOOD POLITICAL ACTION)	AF# 3942
COMMITTEE, and KEARNEY, THOMAS)	
as treasurer;)	
HOMETOWN VALUES PAC, and)	AF# 3943
HELGESEN, FRANCIS XAVIER as)	
treasurer;)	

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JANICEK FOR SENATE, and NIELSEN,)	AF# 3945
MARK THOMAS as treasurer;)	
OUR EVERYDAY PAC, and EMMONS,)	AF# 3946
ROBERT JR. as treasurer;)	
PEOPLE4AMERICA FEDERAL)	AF# 3947
COMMITTEE, and HERMAN, BRIAN as)	
treasurer;)	
ROB ANDERSON FOR LOUISIANA, and)	AF# 3948
ANDERSON, ROBERT JON as treasurer;)	
SOUTHEAST MILK INC POLITICAL)	AF# 3949
ACTION COMMITTEE, and PROFFITT,)	
TODD as treasurer;)	
SUPPORT AMERICAN LEADERS PAC,)	AF# 3950
and TUNSTALL, MATTHEW NELSON as)	
treasurer;)	
TOGETHER WE THRIVE, and)	AF# 3951
CHRISTOPHER ZULLO as treasurer;)	
WOMEN VOTE SMART, and KREMER,)	AF# 3952
AMY S 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 October Quarterly Report (Election Sensitive) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated January 07, 2021, on the following committees:

AF#3932 Decided by a vote of 6-0 to: (1) find reason to believe that 800DEMOCRAT, and RUBIN, MITCHELL in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty

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would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3933 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN PRO-ISRAEL PAC, and SULLIVAN, JEANNE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3934 Decided by a vote of 6-0 to: (1) find reason to believe that ASSOCIATION OF PROFESSIONAL FLIGHT ATTENDANTS (APFA PAC) POLITICAL ACTION COMMITTEE, and CRAIG GUNTER in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3935 Decided by a vote of 6-0 to: (1) find reason to believe that BRAD BARRON FOR US SENATE, and BARRON, JILL M BARRON in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3936 Decided by a vote of 6-0 to: (1) find reason to believe that BRONX UNITED, and PEREZ, RUSH in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3937 Decided by a vote of 6-0 to: (1) find reason to believe that CAMPAIGN TO SUPPORT THE PRESIDENT, and TUNSTALL, MATT in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#3939 Decided by a vote of 6-0 to: (1) find reason to believe that DISTRICT 1199C NAT'L UNION OF HOSPITAL & HEALTH CARE EMPLOYEES POLITICAL ACTION FUND, and SALIMA PACE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3940 Decided by a vote of 6-0 to: (1) find reason to believe that EMILY ROBINSON FOR CONGRESS, and ROBINSON, EMILY in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3942 Decided by a vote of 6-0 to: (1) find reason to believe that FROZEN FOOD POLITICAL ACTION COMMITTEE, and KEARNEY, THOMAS in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3943 Decided by a vote of 6-0 to: (1) find reason to believe that HOMETOWN VALUES PAC, and HELGESEN, FRANCIS XAVIER in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate

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letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3945 Decided by a vote of 6-0 to: (1) find reason to believe that JANICEK FOR SENATE, and NIELSEN, MARK THOMAS in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3946 Decided by a vote of 6-0 to: (1) find reason to believe that OUR EVERYDAY PAC, and EMMONS, ROBERT JR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3947 Decided by a vote of 6-0 to: (1) find reason to believe that PEOPLE4AMERICA FEDERAL COMMITTEE, and HERMAN, BRIAN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3948 Decided by a vote of 6-0 to: (1) find reason to believe that ROB ANDERSON FOR LOUISIANA, and ANDERSON, ROBERT JON in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3949 Decided by a vote of 6-0 to: (1) find reason to believe that SOUTHEAST MILK INC POLITICAL ACTION COMMITTEE, and PROFFITT, TODD in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination

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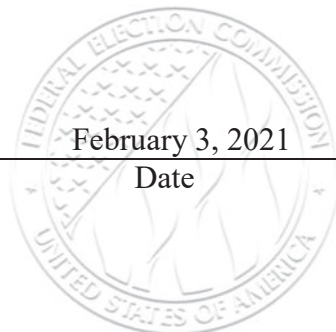
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that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3950 Decided by a vote of 6-0 to: (1) find reason to believe that SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3951 Decided by a vote of 6-0 to: (1) find reason to believe that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#3952 Decided by a vote of 6-0 to: (1) find reason to believe that WOMEN VOTE SMART, and KREMER, AMY S in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.



Attest:

**Laura
Sinram**

Laura E. Sinram
 Acting Secretary and Clerk of the
 Commission

Digitally signed by
 Laura Sinram
 Date: 2021.02.03
 20:04:11 -05'00'



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AF

February 8, 2021

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

C00687657

AF#: 3933

Dear Ms. Sullivan,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file an October Quarterly Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period July 1, 2020 through September 30, 2020, shall be filed no later than October 15, 2020. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report prior to four (4) days before the general election held on November 3, 2020, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On January 8, 2021, the FEC found that there is reason to believe ("RTB") that American Pro-Israel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before October 15, 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 \$7,395. 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 \$7,395 is due within forty (40) days of the finding, or by February 17, 2021, and is based on these factors:

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

AMERICAN PRO-ISRAEL PAC

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

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

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

AMERICAN PRO-ISRAEL PAC

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contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that American Pro-Israel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

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

3. If You Choose to Pay the Civil Money Penalty

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

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

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

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including making a payment in an amount less than the calculated civil money penalty assessed or

AMERICAN PRO-ISRAEL PAC

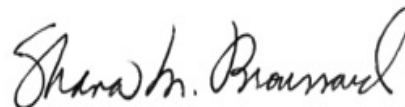
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any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance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

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <https://www.fec.gov/af/pay.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,



Shana M. Broussard
Chair

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 \$7,395 for the October Quarterly Report.

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

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

COMMITTEE NAME: American Pro-Israel PAC

FEC ID#: C00687657

AF#: 3933

PAYMENT DUE DATE: February 17, 2021

PAYMENT AMOUNT DUE: \$7,395

RECEIVED

By Office of the Commission Secretary at 10:32 am, Aug 11, 2021



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

August 11, 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* Kristin D. Roser/Ben Holly *BH*
Reports Analysis Division
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the
2020 October Quarterly Report (Election Sensitive)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2020 October Quarterly Report (Election Sensitive). The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

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

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

American Pro-Israel PAC (AF 3933) disclosed no activity after the RTB finding (previously estimated to be \$137,162), which would result in no civil money penalty (fine previously assessed to be \$7,395).

Hometown Values PAC (AF 3943) filed the 2020 October Quarterly Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$5,533 (previously estimated to be \$42,629), thus the fine would be lowered from \$1,947 to \$834. The committee paid the civil money penalty assessed at RTB; we will therefore issue a refund for the difference (\$1,113).

RAD Recommendation

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

Federal Election Commission
FD Circulation Report Fine Paid
2020 OCTOBER QUARTERLY Election Sensitive 10/15/2020 H_S_P_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
3932	800DEMOCRAT		C00730341	MITCHELL RUBIN	10/27/2020	12	\$45,654	0	01/08/2021	\$877	\$877	02/11/2021	\$877
3934	ASSOCIATION OF PROFESSIONAL FLIGHT ATTENDANTS (APFA PAC) POLITICAL ACTION COMMITTEE		C00246421	CRAIG GUNTER	10/22/2020	7	\$35,678	0	01/08/2021	\$697	\$697	03/04/2021	\$697
3942	FROZEN FOOD POLITICAL ACTION COMMITTEE		C00385740	THOMAS KEARNEY	10/22/2020	7	\$8,320	0	01/08/2021	\$230	\$230	02/11/2021	\$230
3943	HOMETOWN VALUES PAC		C00721886	FRANCIS XAVIER HELGESEN	01/31/2021	*Not Filed	\$5,533	0	01/08/2021	\$1,947	\$834	7/15/2021	**\$1,947
3947	PEOPLE4AMERICA FEDERAL COMMITTEE		C00726224	BRIAN HERMAN	10/24/2020	9	\$162,209	0	01/08/2021	\$3,764	\$3,764	03/09/2021	\$3,764
3949	SOUTHEAST MILK INC POLITICAL ACTION COMMITTEE		C00359984	TODD PROFFITT	10/22/2020	7	\$559	0	01/08/2021	\$160	\$160	02/17/2021	\$160

* The committee did not file their report prior to four (4) days before the general election; therefore, per 11 C.F.R. 111.43(e), the report is considered to be not filed.

** This committee disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty and will be assessed a civil money penalty at Final Determination (FD) that has been reduced since the RTB finding. This committee paid the civil money penalty assessed at RTB; therefore, we will issue a refund for the difference.

Federal Election Commission
FD Circulation Report Fine Not Paid
2020 OCTOBER QUARTERLY Election Sensitive 10/15/2020 H_S_P_UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
3933	AMERICAN PRO-ISRAEL PAC		C00687657	JEANNE SULLIVAN		Not Filed	\$0	0	01/08/2021	\$7,395	215	NONE
3935	BRAD BARRON FOR US SENATE	STEPHEN BRADLEY BARRON	C00723270	JILL M. BARRON		Not Filed	\$128,789 (est)	0	01/08/2021	\$7,395	215	\$7,395
3936	BRONX UNITED		C00727065	RUSH PEREZ		Not Filed	\$37,225 (est)	0	01/08/2021	\$1,947	215	\$1,947
3937	CAMPAIGN TO SUPPORT THE PRESIDENT		C00697862	MATT TUNSTALL	12/16/2020	*Not Filed	\$37,694	0	01/08/2021	\$1,947	215	\$1,947
3939	DISTRICT 1199C NAT'L UNION OF HOSPITAL & HEALTH CARE EMPLOYEES POLITICAL ACTION FUND		C00034066	SALIMA PACE	11/09/2020	*Not Filed	\$26,064	0	01/08/2021	\$1,947	215	\$1,947
3940	EMILY ROBINSON FOR CONGRESS	EMILY ROBINSON	C00717025	EMILY ROBINSON		Not Filed	\$120,240 (est)	0	01/08/2021	\$7,395	215	\$7,395
3945	JANICEK FOR SENATE	CHRIS EDWARD JANICEK	C00675546	MARK THOMAS NIELSEN	10/28/2020	13	\$35,325	0	01/08/2021	\$913	215	\$913
3946	OUR EVERYDAY PAC		C00697128	ROBERT EMMONS		Not Filed	\$34,274 (est)	0	01/08/2021	\$1,947	215	\$1,947
3948	ROB ANDERSON FOR LOUISIANA	ROBERT JON ANDERSON	C00731380	ROBERT JON ANDERSON		Not Filed	\$55,816 (est)	0	01/08/2021	\$4,437	215	\$4,437
3950	SUPPORT AMERICAN LEADERS PAC		C00688069	MATTHEW NELSON TUNSTALL	11/24/2020	*Not Filed	\$594,723	0	01/08/2021	\$17,748	215	\$17,748
3951	TOGETHER WE THRIVE		C00522458	CHRISTOPHER ZULLO		Not Filed	\$104,451 (est)	0	01/08/2021	\$7,395	215	\$7,395
3952	WOMEN VOTE SMART		C00616912	AMY S. KREMER		Not Filed	\$145,616 (est)	0	01/08/2021	\$7,395	215	\$7,395

* The committee did not file their report prior to four (4) days before the general election; therefore, per 11 C.F.R. 111.43(e), the report is considered to be not filed.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Administrative Fine Program – Final)	
Determination Recommendation for the)	
2020 October Quarterly (Election)	
Sensitive):		
800DEMOCRAT, and RUBIN,)	AF# 3932
MITCHELL as treasurer;)	
AMERICAN PRO-ISRAEL PAC, and)	AF# 3933
SULLIVAN, JEANNE as treasurer;)	
ASSOCIATION OF PROFESSIONAL)	AF# 3934
FLIGHT ATTENDANTS (APFA PAC))	
POLITICAL ACTION COMMITTEE, and)	
CRAIG GUNTER as treasurer;)	
BRAD BARRON FOR US SENATE, and)	AF# 3935
BARRON, JILL M BARRON as treasurer;)	
BRONX UNITED, and PEREZ, RUSH as)	AF# 3936
treasurer;)	
CAMPAIGN TO SUPPORT THE)	AF# 3937
PRESIDENT, and TUNSTALL, MATT as)	
treasurer;)	
DISTRICT 1199C NAT'L UNION OF)	AF# 3939
HOSPITAL & HEALTH CARE)	
EMPLOYEES POLITICAL ACTION)	
FUND, and SALIMA PACE as treasurer;)	
EMILY ROBINSON FOR CONGRESS,)	AF# 3940
and ROBINSON, EMILY as treasurer;)	
FROZEN FOOD POLITICAL ACTION)	AF# 3942
COMMITTEE, and KEARNEY, THOMAS)	
as treasurer;)	
HOMETOWN VALUES PAC, and)	AF# 3943
HELGESEN, FRANCIS XAVIER as)	
treasurer;)	
JANICEK FOR SENATE, and NIELSEN,)	AF# 3945
MARK THOMAS as treasurer;)	
OUR EVERYDAY PAC, and EMMONS,)	AF# 3946
ROBERT as treasurer;)	

Federal Election Commission
 Certification for Administrative Fines
 August 12, 2021

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PEOPLE4AMERICA FEDERAL	AF# 3947
COMMITTEE, and HERMAN, BRIAN as	
treasurer;	
ROB ANDERSON FOR LOUISIANA, and) AF# 3948
ANDERSON, ROBERT JON as treasurer;)
SOUTHEAST MILK INC POLITICAL) AF# 3949
ACTION COMMITTEE, and PROFFITT,)
TODD as treasurer;)
SUPPORT AMERICAN LEADERS PAC,) AF# 3950
and TUNSTALL, MATTHEW NELSON as)
treasurer;)
TOGETHER WE THRIVE, and) AF# 3951
CHRISTOPHER ZULLO as treasurer;)
WOMEN VOTE SMART, and KREMER,) AF# 3952
AMY S as treasurer;)

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on August 12, 2021 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2020 October Quarterly (Election Sensitive), as recommended in the Reports Analysis Division's Memorandum dated August 11, 2021, on the following committees:

AF#3932 Decided by a vote of 5-0 to: (1) make a final determination that 800DEMOCRAT, and RUBIN, MITCHELL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3933 Decided by a vote of 5-0 to: (1) make a final determination that AMERICAN PRO-ISRAEL PAC, and SULLIVAN, JEANNE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3934 Decided by a vote of 5-0 to: (1) make a final determination that ASSOCIATION OF PROFESSIONAL FLIGHT ATTENDANTS (APFA PAC) POLITICAL ACTION COMMITTEE, and CRAIG GUNTER in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3935 Decided by a vote of 5-0 to: (1) make a final determination that BRAD BARRON FOR US SENATE, and BARRON, JILL M BARRON in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3936 Decided by a vote of 5-0 to: (1) make a final determination that BRONX UNITED, and PEREZ, RUSH in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3937 Decided by a vote of 5-0 to: (1) make a final determination that CAMPAIGN TO SUPPORT THE PRESIDENT, and TUNSTALL, MATT in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3939 Decided by a vote of 5-0 to: (1) make a final determination that DISTRICT 1199C NAT'L UNION OF HOSPITAL & HEALTH CARE EMPLOYEES POLITICAL ACTION FUND, and SALIMA PACE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3940 Decided by a vote of 5-0 to: (1) make a final determination that EMILY ROBINSON FOR CONGRESS, and ROBINSON, EMILY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3942 Decided by a vote of 5-0 to: (1) make a final determination that FROZEN FOOD POLITICAL ACTION COMMITTEE, and KEARNEY, THOMAS in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3943 Decided by a vote of 5-0 to: (1) make a final determination that HOMETOWN VALUES PAC, and HELGESEN, FRANCIS XAVIER in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3945 Decided by a vote of 5-0 to: (1) make a final determination that JANICEK FOR SENATE, and NIELSEN, MARK THOMAS in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3946 Decided by a vote of 5-0 to: (1) make a final determination that OUR EVERYDAY PAC, and EMMONS, ROBERT in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3947 Decided by a vote of 5-0 to: (1) make a final determination that PEOPLE4AMERICA FEDERAL COMMITTEE, and HERMAN, BRIAN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3948 Decided by a vote of 5-0 to: (1) make a final determination that ROB ANDERSON FOR LOUISIANA, and ANDERSON, ROBERT JON in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

Federal Election Commission
Certification for Administrative Fines
August 12, 2021

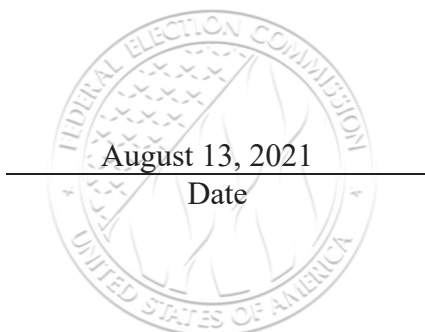
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AF#3949 Decided by a vote of 5-0 to: (1) make a final determination that SOUTHEAST MILK INC POLITICAL ACTION COMMITTEE, and PROFFITT, TODD in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3950 Decided by a vote of 5-0 to: (1) make a final determination that SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3951 Decided by a vote of 5-0 to: (1) make a final determination that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.

AF#3952 Decided by a vote of 5-0 to: (1) make a final determination that WOMEN VOTE SMART, and KREMER, AMY S in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey did not vote.



Attest:

Laura
Sinram

Laura E. Sinram
Acting Secretary and Clerk of the
Commission

Digitally signed by Laura
Sinram
Date: 2021.08.13
17:31:03 -04'00'



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AF

August 24, 2021

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

C00687657

AF#: 3933

Dear Ms. Sullivan,

On January 8, 2021, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that American Pro-Israel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2020 October Quarterly Report. By letter dated February 8, 2021, the Commission notified you of the RTB finding and the preliminary civil money penalty calculated at the RTB stage to be \$7,395 in accordance with the schedule of penalties at 11 CFR § 111.43. Please note that you must file the October Quarterly Report in the appropriate format if you have not already done so for your report to be considered filed.

Since that time, the amount of the civil money penalty has been changed to reflect the actual level of activity disclosed in the miscellaneous document dated March 31, 2021. The FEC made a final determination on August 12, 2021 that American Pro-Israel PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed no civil money penalty in accordance with 11 CFR § 111.43, and voted to close the file.

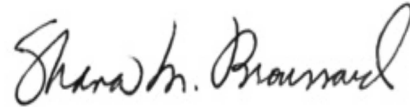
The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding this matter, please contact Ben Holly on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

AMERICAN PRO-ISRAEL PAC

Page 2 of 2

On behalf of the Commission,

A handwritten signature in black ink, reading "Shana M. Broussard". The signature is written in a cursive, flowing style with a large, looped initial 'S'.

Shana M. Broussard
Chair