



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

December 14, 2020

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP*

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: Reason To Believe Recommendation – 2020 12 Day Pre-General Report  
(Unauthorized Committees – Monthly Filers) for the Administrative Fine  
Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2020 12 Day Pre-General Report in accordance with 52 U.S.C. § 30104(a). The 12 Day Pre-General Report was due on October 22, 2020 and the General Election was held on November 3, 2020. The list is comprised of unauthorized committees that file monthly.

The committees listed on the attached RTB Circulation Report either filed the election sensitive report after the due date 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 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 PRE-GENERAL Election Sensitive 10/22/2020 UNAUTH\_M

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4013	C00264770	AGRICULTURAL RETAILERS ASSOCIATION POLITICAL ACTION COMMITTEE		TIMOTHY EDWIN	\$197,522	0	10/28/2020	6	\$5,042	\$217
4014	C00249342	AMERICAN SOCIETY OF PLASTIC SURGEONS PLASTYPAC		BOB C. BASU	\$516,629	0	11/20/2020	Not Filed*	\$6,972	\$834
4015	C00702324	CONSERVATIVES FOR A BETTER NORTH CAROLINA		SARA HENDRICKS	\$100,398	0		Not Filed	\$7,723 (est)	\$834
4016	C00146605	FARMERS' RICE COOPERATIVE FUND		BILL TANIMOTO	\$212,946	0		Not Filed	\$10,140 (est)	\$1,252
4017	C00695619	HEALTH JUSTICE FOR ALL		ERIC FEIGL-DING	\$232,247	0		Not Filed	\$16,589 (est)	\$1,252
4018	C00008409	INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL #302 VOLUNTARY POLITICAL FUND		DAREN KONOPASKI	\$944,683	0	11/6/2020	Not Filed*	\$25,000	\$1,947
4019	C00522946	IUPAT DISTRICT COUNCIL 82 PAC		KENNETH J. GORMAN	\$102,706	0	10/29/2020	7	\$8,608	\$230
4020	C00482570	JACKSON LEWIS P.C. POLITICAL ACTION COMMITTEE		ANDREW CHARWAT	\$141,699	0	11/17/2020	Not Filed*	\$2,500	\$696
4021	C00426809	MADISON PAC; THE		BRIAN J. AHERN	\$1,886,734	0	12/3/2020	Not Filed*	\$19,000	\$1,252
4022	C00298000	MADISON PROJECT INC.		KELLY AMORIN	\$1,748,340	0	10/30/2020	Not Filed*	\$117,945	\$7,395
4023	C00360008	NATIONAL THOROUGHBRED RACING ASSOCIATION POLITICAL ACTION COMMITTEE/HORSE PAC		AMBER FLORENCE	\$630,642	0	10/28/2020	6	\$6,183	\$217
4024	C00406645	TARRANT COUNTY REPUBLICAN VICTORY FUND		SHANNON DUBBERLY	\$484,268	0		Not Filed	\$23,060 (est)	\$1,252

\* 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	)	
	)	
Reason To Believe Recommendation –	)	
2020 12 Day Pre-General Report	)	
(Unauthorized Committees – Monthly	)	
Filers) for the Administrative Fine Program:	)	
AGRICULTURAL RETAILERS	)	AF# 4013
ASSOCIATION POLITICAL ACTION	)	
COMMITTEE, and EDWIN, TIMOTHY as	)	
treasurer;	)	
AMERICAN SOCIETY OF PLASTIC	)	AF# 4014
SURGEONS PLASTYPAC, and BASU, C.	)	
BOB DR. MD, MBA, M as treasurer;	)	
CONSERVATIVES FOR A BETTER	)	AF# 4015
NORTH CAROLINA, and HENDRICKS,	)	
SARA as treasurer;	)	
FARMERS' RICE COOPERATIVE FUND,	)	AF# 4016
and TANIMOTO, BILL as treasurer;	)	
HEALTH JUSTICE FOR ALL, and	)	AF# 4017
FEIGL-DING, ERIC DR. as treasurer;	)	
INTERNATIONAL UNION OF	)	AF# 4018
OPERATING ENGINEERS LOCAL #302	)	
VOLUNTARY POLITICAL FUND, and	)	
KONOPASKI, DAREN as treasurer;	)	
IUPAT DISTRICT COUNCIL 82 PAC, and	)	AF# 4019
GORMAN, KENNETH J. as treasurer;	)	
JACKSON LEWIS P.C. POLITICAL	)	AF# 4020
ACTION COMMITTEE, and CHARWAT,	)	
ANDREW as treasurer;	)	
MADISON PAC; THE, and AHERN,	)	AF# 4021
BRIAN J. MR. as treasurer;	)	
MADISON PROJECT INC., and	)	AF# 4022
AMORIN, KELLY as treasurer;	)	
NATIONAL THOROUGHBRED RACING	)	AF# 4023
ASSOCIATION POLITICAL ACTION	)	
COMMITTEE/HORSE PAC, and	)	
FLORENCE, AMBER as treasurer;	)	
TARRANT COUNTY REPUBLICAN	)	AF# 4024
VICTORY FUND, and DUBBERLY,	)	
SHANNON as treasurer;	)	

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 07, 2021, the Commission took the following actions on the Reason To Believe Recommendation – 2020 12 Day Pre-General Report (Unauthorized Committees – Monthly Filers) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated December 14, 2020, on the following committees:

AF#4013 Decided by a vote of 6-0 to: (1) find reason to believe that AGRICULTURAL RETAILERS ASSOCIATION POLITICAL ACTION COMMITTEE, and EDWIN, TIMOTHY 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#4014 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN SOCIETY OF PLASTIC SURGEONS PLASTYPAC, and BASU, C. BOB DR. MD, MBA, M 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#4015 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; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4016 Decided by a vote of 6-0 to: (1) find reason to believe that FARMERS' RICE COOPERATIVE FUND, and TANIMOTO, BILL in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4017 Decided by a vote of 6-0 to: (1) find reason to believe that HEALTH JUSTICE FOR ALL, and FEIGL-DING, ERIC DR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4018 Decided by a vote of 6-0 to: (1) find reason to believe that INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL #302 VOLUNTARY POLITICAL FUND, and KONOPASKI, DAREN 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#4019 Decided by a vote of 6-0 to: (1) find reason to believe that IUPAT DISTRICT COUNCIL 82 PAC, and GORMAN, KENNETH J. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4020 Decided by a vote of 6-0 to: (1) find reason to believe that JACKSON LEWIS P.C. POLITICAL ACTION COMMITTEE, and CHARWAT, ANDREW 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#4021 Decided by a vote of 6-0 to: (1) find reason to believe that MADISON PAC; THE, and AHERN, BRIAN J. MR. in his official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4022 Decided by a vote of 6-0 to: (1) find reason to believe that MADISON PROJECT INC., and AMORIN, KELLY 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.

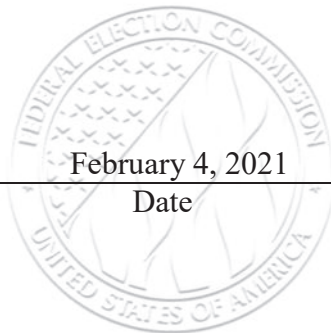
AF#4023 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL THOROUGHBRED RACING ASSOCIATION POLITICAL ACTION

Federal Election Commission  
Certification for Administrative Fines  
January 07, 2021

Page 4

COMMITTEE/HORSE PAC, and FLORENCE, AMBER 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#4024 Decided by a vote of 6-0 to: (1) find reason to believe that TARRANT COUNTY REPUBLICAN VICTORY FUND, and DUBBERLY, SHANNON 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.



---

February 4, 2021

Date

Attest:

**Laura  
Sinram**

Digitally signed by  
Laura Sinram  
Date: 2021.02.04  
16:57:37 -05'00'

---

Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

February 9, 2021

Amber Florence, in official capacity as Treasurer  
National Thoroughbred Racing Association Political Action Committee/Horse PAC  
401 West Main Street, Suite 222  
Lexington, KY 40507

C00360008

AF#: 4023

Dear Ms. Florence,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12 Day Pre-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report, covering the period October 1, 2020 through October 14, 2020, shall be filed no later than October 22, 2020. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on October 28, 2020, 6 days late.

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 7, 2021, the FEC found that there is reason to believe ("RTB") that National Thoroughbred Racing Association Political Action Committee/Horse 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 22, 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 \$217. 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 \$217 is due within forty (40) days of the finding, or by February 16, 2021, and is based on these factors:

Election Sensitivity of Report: Election Sensitive

Level of Activity: \$6,183

Number of Days Late: 6

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**



NATIONAL THOROUGHBRED RACING ASSOCIATION POLITICAL ACTION  
COMMITTEE/HORSE PAC

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 16, 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;

NATIONAL THOROUGHBRED RACING ASSOCIATION POLITICAL ACTION  
COMMITTEE/HORSE PAC

Page 3 of 5

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 National Thoroughbred Racing Association Political Action Committee/Horse 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 a payment in an amount less than the calculated civil money penalty assessed or any

NATIONAL THOROUGHBRED RACING ASSOCIATION POLITICAL ACTION  
COMMITTEE/HORSE PAC

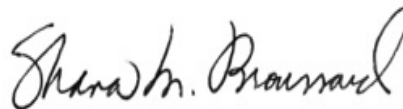
Page 4 of 5

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 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

-----  
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 \$217 for the 2020 Pre-General Report.

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

NATIONAL THOROUGHBRED RACING ASSOCIATION POLITICAL ACTION  
COMMITTEE/HORSE PAC

Page 5 of 5

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

COMMITTEE NAME: National Thoroughbred Racing Association Political Action  
Committee/Horse PAC

FEC ID#: C00360008

AF#: 4023

PAYMENT DUE DATE: February 16, 2021

PAYMENT AMOUNT DUE: \$217

**RECEIVED**

By Office of the Commission Secretary at 5:02 pm, Sep 22, 2021



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

September 22, 2021

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP*

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the 2020 12-Day Pre-General Report (Unauthorized Committees – Monthly Filers)

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 12-Day Pre-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the 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.

Farmers' Rice Cooperative Fund (AF 4016) filed the 2020 12-Day Pre-General Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and

disbursements of \$5,550 (previously estimated to be \$10,140), thus the fine would be lowered from \$1,252 to \$834.

Health Justice For All (AF 4017) disclosed no activity after the RTB finding (previously estimated to be \$16,589), which would result in no civil money penalty (fine previously assessed to be \$1,252).

### **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 their official capacity, listed on the attached reports with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (3) Send the appropriate letters.

Federal Election Commission  
FD Circulation Report Fine Paid  
2020 PRE-GENERAL Election Sensitive 10/22/2020 UNAUTH\_M

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
4013	AGRICULTURAL RETAILERS ASSOCIATION POLITICAL ACTION COMMITTEE		C00264770	TIMOTHY EDWIN	10/28/2020	6	\$5,042	0	01/07/2021	\$217	\$217	02/11/2021	\$217
4014	AMERICAN SOCIETY OF PLASTIC SURGEONS PLASTYPAC		C00249342	BOB BASU	11/20/2020	*Not Filed	\$6,972	0	01/07/2021	\$834	\$834	02/17/2021	\$834
4018	INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL #302 VOLUNTARY POLITICAL FUND		C00008409	DAREN KONOPASKI	11/06/2020	*Not Filed	\$25,000	0	01/07/2021	\$1,947	\$1,947	02/17/2021	\$1,947
4019	IUPAT DISTRICT COUNCIL 82 PAC		C00522946	KENNETH J. GORMAN	10/29/2020	7	\$8,608	0	01/07/2021	\$230	\$230	02/12/2021	\$230
4020	JACKSON LEWIS P.C. POLITICAL ACTION COMMITTEE		C00482570	ANDREW CHARWAT	11/17/2020	*Not Filed	\$2,500	0	01/07/2021	\$696	\$696	02/11/2021	\$696
4022	MADISON PROJECT INC.		C00298000	KELLY AMORIN	10/30/2020	*Not Filed	\$117,945	0	01/07/2021	\$7,395	\$7,395	02/16/2021	\$7,395
4023	NATIONAL THOROUGHBRED RACING ASSOCIATION POLITICAL ACTION COMMITTEE/HORSE PAC		C00360008	AMBER FLORENCE	10/28/2020	6	\$6,183	0	01/07/2021	\$217	\$217	02/11/2021	\$217
4024	TARRANT COUNTY REPUBLICAN VICTORY FUND		C00406645	SHANNON DUBBERLY	01/20/2021	*Not Filed	\$62,199	0	01/07/2021	\$1,252	\$1,252	05/20/2021	\$1,252

\* 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.



Federal Election Commission  
 FD Circulation Report Fine Not Paid  
 2020 PRE-GENERAL Election Sensitive 10/22/2020 UNAUTH\_M

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
4016	FARMERS' RICE COOPERATIVE FUND		C00146605	BILL TANIMOTO	09/21/2021	*Not Filed	\$5,550	0	01/07/2021	\$1,252	258	\$834
4017	HEALTH JUSTICE FOR ALL		C00695619	ERIC FEIGL-DING		Not Filed	\$0	0	01/07/2021	\$1,252	258	NONE
4021	MADISON PAC; THE		C00426809	BRIAN J. AHERN	12/03/2020	*Not Filed	\$19,000	0	01/07/2021	\$1,252	258	\$1,252

\* 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 12-Day Pre-General Report	)	
(Unauthorized Committees – Monthly	)	
Filers):	)	
AGRICULTURAL RETAILERS	)	AF# 4013
ASSOCIATION POLITICAL ACTION	)	
COMMITTEE, and EDWIN, TIMOTHY as	)	
treasurer;	)	
AMERICAN SOCIETY OF PLASTIC	)	AF# 4014
SURGEONS PLASTYPAC, and BASU,	)	
BOB as treasurer;	)	
FARMERS' RICE COOPERATIVE FUND,	)	AF# 4016
and TANIMOTO, BILL as treasurer;	)	
HEALTH JUSTICE FOR ALL, and	)	AF# 4017
FEIGL-DING, ERIC as treasurer;	)	
INTERNATIONAL UNION OF	)	AF# 4018
OPERATING ENGINEERS LOCAL #302	)	
VOLUNTARY POLITICAL FUND, and	)	
KONOPASKI, DAREN as treasurer;	)	
IUPAT DISTRICT COUNCIL 82 PAC, and	)	AF# 4019
GORMAN, KENNETH J. as treasurer;	)	
JACKSON LEWIS P.C. POLITICAL	)	AF# 4020
ACTION COMMITTEE, and CHARWAT,	)	
ANDREW as treasurer;	)	
MADISON PAC; THE, and AHERN,	)	AF# 4021
BRIAN J. as treasurer;	)	
MADISON PROJECT INC., and	)	AF# 4022
AMORIN, KELLY as treasurer;	)	
NATIONAL THOROUGHBRED RACING	)	AF# 4023
ASSOCIATION POLITICAL ACTION	)	
COMMITTEE/HORSE PAC, and	)	
FLORENCE, AMBER as treasurer;	)	
TARRANT COUNTY REPUBLICAN	)	AF# 4024
VICTORY FUND, and DUBBERLY,	)	
SHANNON as treasurer;	)	

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on September 24, 2021 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2020 12-Day Pre-General Report (Unauthorized Committees – Monthly Filers), as recommended in the Reports Analysis Division's Memorandum dated September 22, 2021, on the following committees:

AF#4013 Decided by a vote of 4-0 to: (1) make a final determination that AGRICULTURAL RETAILERS ASSOCIATION POLITICAL ACTION COMMITTEE, and EDWIN, TIMOTHY 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

AF#4014 Decided by a vote of 4-0 to: (1) make a final determination that AMERICAN SOCIETY OF PLASTIC SURGEONS PLASTYPAC, and BASU, BOB 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

AF#4016 Decided by a vote of 4-0 to: (1) make a final determination that FARMERS' RICE COOPERATIVE FUND, and TANIMOTO, BILL 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

AF#4017 Decided by a vote of 4-0 to: (1) make a final determination that HEALTH JUSTICE FOR ALL, and FEIGL-DING, ERIC 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

AF#4018 Decided by a vote of 4-0 to: (1) make a final determination that INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL #302 VOLUNTARY POLITICAL FUND, and KONOPASKI, DAREN 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

AF#4019 Decided by a vote of 4-0 to: (1) make a final determination that IUPAT DISTRICT COUNCIL 82 PAC, and GORMAN, KENNETH J. 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

AF#4020 Decided by a vote of 4-0 to: (1) make a final determination that JACKSON LEWIS P.C. POLITICAL ACTION COMMITTEE, and CHARWAT, ANDREW 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

AF#4021 Decided by a vote of 4-0 to: (1) make a final determination that MADISON PAC; THE, and AHERN, BRIAN J. 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

AF#4022 Decided by a vote of 4-0 to: (1) make a final determination that MADISON PROJECT INC., and AMORIN, KELLY 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

AF#4023 Decided by a vote of 4-0 to: (1) make a final determination that NATIONAL THOROUGHBRED RACING ASSOCIATION POLITICAL ACTION COMMITTEE/HORSE PAC, and FLORENCE, AMBER 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.

Federal Election Commission  
Certification for Administrative Fines  
September 24, 2021

Page 4

AF#4024 Decided by a vote of 4-0 to: (1) make a final determination that TARRANT COUNTY REPUBLICAN VICTORY FUND, and DUBBERLY, SHANNON 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 Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for the decision. Commissioners Broussard and Trainor did not vote.



Attest:

Laura e  
Sinram

Digitally signed by Laura  
e Sinram  
Date: 2021.09.29  
13:10:05 -04'00'

Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

September 30, 2021

Amber Florence, in official capacity as Treasurer  
National Thoroughbred Racing Association Political Action Committee/Horse PAC  
401 West Main Street  
Suite 222  
Lexington, KY 40507

C00360008

AF#: 4023

Dear Ms. Florence,

On January 7, 2021, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that National Thoroughbred Racing Association Political Action Committee/Horse 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 Pre-General Report. By letter dated February 9, 2021, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$217 in accordance with the schedule of penalties at 11 CFR § 111.43.

On February 11, 2021, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on September 24, 2021 that National Thoroughbred Racing Association Political Action Committee/Horse PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$217 in accordance with 11 CFR § 111.43, and voted to close the file.

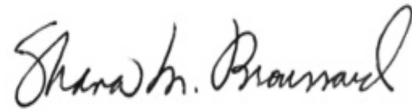
The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

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

NATIONAL THOROUGHBRED RACING ASSOCIATION POLITICAL ACTION  
COMMITTEE/HORSE PAC

Page 2 of 2

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 with a large initial 'S'.

Shana M. Broussard  
Chair