



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

March 17, 2021

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer  
Staff Director *AP*

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division  
*KDR*

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

SUBJECT: Reason To Believe Recommendation - 2020 30 Day Post-General Report  
(Unauthorized 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 30 Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2020 30 Day Post-General Report.

The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report after the due date but within thirty (30) days of 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 11 C.F.R. § 111.43, these committees should be assessed the civil money penalties indicated in the attachment.

In order to determine the level of activity for unauthorized quarterly filers that failed to file or failed to timely file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2020 through November 23, 2020 (54 days), was reviewed for activity which would have required the filing of a 12 Day Pre-General Report (12 Day Report). If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 25.93% (14 days (12G Filing Period)/54 days (30G Filing Period)).
- The committees identified through this process as failing to file or failing to timely file the 12 Day Report were included in the Reason to Believe Recommendation circulated to the Commission on March 4, 2021. If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will also be assessed a fine for the 30 Day Report based on the estimated levels of activity described above and are included on the attached list.
- Every Year-End Report (YE) submitted by an unauthorized quarterly filer that covered the period from October 1, 2020 through December 31, 2020 (92 days) was reviewed for activity which would have required the filing of a 30G. If our research indicated that a 30G was required, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 58.70% (54 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G. If the same committee was required to file the 12 Day Report, but failed to file this report, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 43.48% (40 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G.

## **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 POST-GENERAL Not Election Sensitive 12/03/2020 UNAUTH

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4066	C00747592	43 ALUMNI FOR AMERICA	KAREN KIRKSEY	\$121,089	0		Not Filed	\$40,363 (est)	\$1,267
4067	C00705384	AMERICA GREAT PAC	JASON PALLANTE	\$570,690	0	12/28/2020	25	\$300,669	\$9,695
4068	C00737296	AMERICAN DIGNITY PAC	JAMES DIRK SCHWENK	\$143,051	0	12/21/2020	18	\$15,298	\$259
4069	C00687657	AMERICAN PRO-ISRAEL PAC	JEANNE SULLIVAN	\$137,162	3		Not Filed	\$137,162 (est)	\$11,786
4070	C00438358	AMSTED INDUSTRIES INCORPORATED PAC	TRISTAN PAIGE LOPEZ	\$223,804	1		Not Filed	\$44,761 (est)	\$1,583
4071	C00696211	BATTLE FOR AMERICA PAC	WINSTON WOLFE	\$139,752	0	12/28/2020	25	\$14,556	\$301
4072	C00727065	BRONX UNITED	RUSH PEREZ	\$111,675	0		Not Filed	\$37,225 (est)	\$1,267
4073	C00386300	CALUMET PAC	TERRY BRONOWSKI	\$158,300	0	1/31/2021	*Not Filed	\$200	\$200
4074	C00697862	CAMPAIGN TO SUPPORT THE PRESIDENT	MATT TUNSTALL	\$368,361	1	12/16/2020	13	\$1,185	\$142
4075	C00743146	COMMITTEE TO ELECT ROBERT J. LOVERO	MICHAEL W. FELLOWS	\$400,661	0	2/10/2021	*Not Filed	\$39,241	\$1,267
4076	C00409458	CONSERVATIVE OPPORTUNITIES FOR A NEW AMERICA PAC	WILLIAM BAIN	\$249,461	1	1/13/2021	*Not Filed	\$1,079	\$438
4077	C00176420	DEMOCRATIC FOUNDATION OF ORANGE COUNTY	GLEN HATTON	\$171,273	0	1/31/2021	*Not Filed	\$12,156	\$704
4078	C00034066	DISTRICT 1199C NAT'L UNION OF HOSPITAL & HEALTH CARE EMPLOYEES POLITICAL ACTION FUND	SALIMA PACE	\$147,309	0	12/10/2020	7	\$37,542	\$494
4079	C00146605	FARMERS' RICE COOPERATIVE FUND	BILL TANIMOTO	\$217,946	2	12/11/2020	8	\$5,000	\$177
4080	C00749861	FUTURE GENERATIONS	JEANNE E. LEGAULT	\$107,804	0	1/1/2021	29	\$75,250	\$4,977
4081	C00721886	HOMETOWN VALUES PAC	FRANCIS XAVIER HELGESEN	\$133,757	0	1/31/2021	*Not Filed	\$337	\$337
4082	C00743377	LV STRONG	CHRISTOPHER NICHOLAS	\$100,325	0		Not Filed	\$50,163 (est)	\$4,041
4083	C00221507	MASSACHUSETTS BANKERS PAC-FEDERAL FUND	KEVIN F. KILEY	\$117,392	0	12/9/2020	6	\$10,912	\$187
4084	C00309468	MSCPAC	STEVE MARKOSKY	\$144,619	0	1/25/2021	*Not Filed	\$14,341	\$704
4085	C00297739	NATURAL PRODUCTS ASSOCIATION POLITICAL ACTION COMMITTEE	DAN FABRICANT	\$190,280	0	12/14/2020	11	\$3,049	\$102

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4086	C00556605	NEVADA COUNTY REPUBLICAN PARTY	FRANCES J. FREEDLE	\$122,609	0	1/13/2021	*Not Filed	\$9,694	\$422
4087	C00710764	NIAC ACTION PAC	JAMAL ABDI	\$278,363	0	1/31/2021	*Not Filed	\$146,591	\$6,735
4088	C00167213	OKLAHOMA LEADERSHIP COUNCIL	MICHAEL G. MCCUTCHIN	\$2,023,214	2	12/22/2020	19	\$427,285	\$12,984
4089	C00631192	ONLY IF YOU RUN	REBECCA BERWICK	\$182,480	0	1/28/2021	*Not Filed	\$9,943	\$422
4090	C00699090	PEOPLE POWERED ACTION	GWENDOLYN PULIDO	\$37,177,867	0	12/20/2020	17	\$201,554	\$5,933
4091	C00726224	PEOPLE4AMERICA FEDERAL COMMITTEE	BRIAN HERMAN	\$490,788	0	2/3/2021	*Not Filed	\$146,733	\$6,735
4092	C00684555	REGULAR PEOPLE	PAUL BLUM	\$342,347	0	12/21/2020	18	\$245,227	\$6,194
4093	C00746594	SALVEMOS A PUERTO RICO	JOSEPH FUENTES	\$395,107	0		Not Filed	\$197,554 (est)	\$8,231
4094	C00406645	TARRANT COUNTY REPUBLICAN VICTORY FUND	SHANNON DUBBERLY	\$617,720	4	1/20/2021	*Not Filed	\$71,251	\$8,082
4095	C00725994	TFY PAC	OLUBUSOLA OBAYAN	\$135,572	1	12/17/2020	14	\$10,544	\$293
4096	C00571976	THE PETER NORBECK LEADERSHIP PAC	BOB GRAY	\$781,889	0	2/1/2021	*Not Filed	\$124,771	\$6,735
4097	C00522458	TOGETHER WE THRIVE	CHRISTOPHER ZULLO	\$417,802	0		Not Filed	\$104,451 (est)	\$6,735
4098	C00656942	UNITED AMERICAN VETERANS PAC	BRYAN JAMES MONVILLE	\$410,857	0	1/16/2021	*Not Filed	\$35,829	\$1,267
4099	C00723148	VISUAL DISOBEDIENCE CAMPAIGN COMMITTEE	PHILIP L. SHEMANSKI	\$193,080	0	12/18/2020	15	\$15,560	\$241
4100	C00667592	WASHOE COUNTY REPUBLICAN CENTRAL COMMITTEE	PATRICIA MILLER	\$189,388	0	1/15/2021	*Not Filed	\$85,221	\$5,237
4101	C00616912	WOMEN VOTE SMART	AMY S. KREMER	\$291,231	1		Not Filed	\$145,616 (est)	\$8,418

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

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reason To Believe Recommendation - 2020	)	
30 Day Post-General Report (Unauthorized	)	
Filers) for the Administrative Fine Program:	)	
43 ALUMNI FOR AMERICA, and	)	AF# 4066
KIRKSEY, KAREN as treasurer;	)	
AMERICA GREAT PAC, and JASON	)	AF# 4067
PALLANTE as treasurer;	)	
AMERICAN DIGNITY PAC, and	)	AF# 4068
SCHWENK, JAMES DIRK as treasurer;	)	
AMERICAN PRO-ISRAEL PAC, and	)	AF# 4069
SULLIVAN, JEANNE as treasurer;	)	
AMSTED INDUSTRIES	)	AF# 4070
INCORPORATED PAC, and LOPEZ,	)	
TRISTAN PAIGE as treasurer;	)	
BATTLE FOR AMERICA PAC, and	)	AF# 4071
WOLFE, WINSTON as treasurer;	)	
BRONX UNITED, and PEREZ, RUSH as	)	AF# 4072
treasurer;	)	
CALUMET PAC, and BRONOWSKI,	)	AF# 4073
TERRY as treasurer;	)	
CAMPAIGN TO SUPPORT THE	)	AF# 4074
PRESIDENT, and TUNSTALL, MATT as	)	
treasurer;	)	
COMMITTEE TO ELECT ROBERT J.	)	AF# 4075
LOVERO, and FELLOWS, MICHAEL W	)	
as treasurer;	)	
CONSERVATIVE OPPORTUNITIES FOR	)	AF# 4076
A NEW AMERICA PAC, and BAIN,	)	
WILLIAM R. MR. as treasurer;	)	
DEMOCRATIC FOUNDATION OF	)	AF# 4077
ORANGE COUNTY, and HATTON,	)	
GLEN as treasurer;	)	
DISTRICT 1199C NAT'L UNION OF	)	AF# 4078
HOSPITAL & HEALTH CARE	)	
EMPLOYEES POLITICAL ACTION	)	
FUND, and SALIMA PACE as treasurer;	)	
FARMERS' RICE COOPERATIVE FUND,	)	AF# 4079
and TANIMOTO, BILL as treasurer;	)	
FUTURE GENERATIONS, and	)	AF# 4080
LEGAULT, JEANNE E as treasurer;	)	
	)	

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HOMETOWN VALUES PAC, and	)	AF# 4081
HELGESEN, FRANCIS XAVIER as	)	
treasurer;	)	
LV STRONG, and NICHOLAS,	)	AF# 4082
CHRISTOPHER as treasurer;	)	
MASSACHUSETTS BANKERS PAC-	)	AF# 4083
FEDERAL FUND, and KILEY, KEVIN F	)	
MR as treasurer;	)	
MSCPAC, and STEVE MARKOSKY as	)	AF# 4084
treasurer;	)	
NATURAL PRODUCTS ASSOCIATION	)	AF# 4085
POLITICAL ACTION COMMITTEE, and	)	
DAN FABRICANT as treasurer;	)	
NEVADA COUNTY REPUBLICAN	)	AF# 4086
PARTY, and FRANCES J FREEDLE as	)	
treasurer;	)	
NIAC ACTION PAC, and ABDI, JAMAL	)	AF# 4087
as treasurer;	)	
OKLAHOMA LEADERSHIP COUNCIL,	)	AF# 4088
and MCCUTCHIN, MICHAEL G as	)	
treasurer;	)	
ONLY IF YOU RUN, and REBECCA	)	AF# 4089
BERWICK as treasurer;	)	
PEOPLE POWERED ACTION, and	)	AF# 4090
PULIDO, GWENDOLYN as treasurer;	)	
PEOPLE4AMERICA FEDERAL	)	AF# 4091
COMMITTEE, and HERMAN, BRIAN as	)	
treasurer;	)	
REGULAR PEOPLE, and BLUM, PAUL	)	AF# 4092
as treasurer;	)	
SALVEMOS A PUERTO RICO, and	)	AF# 4093
FUENTES, JOSEPH as treasurer;	)	
TARRANT COUNTY REPUBLICAN	)	AF# 4094
VICTORY FUND, and DUBBERLY,	)	
SHANNON as treasurer;	)	
TFY PAC, and OBAYAN, OLUBUSOLA	)	AF# 4095
as treasurer;	)	
THE PETER NORBECK LEADERSHIP	)	AF# 4096
PAC, and GRAY, BOB as treasurer;	)	
TOGETHER WE THRIVE, and	)	AF# 4097
CHRISTOPHER ZULLO as treasurer;	)	
UNITED AMERICAN VETERANS PAC,	)	AF# 4098
and MONVILLE, BRYAN JAMES as	)	
treasurer;	)	



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VISUAL DISOBEDIENCE CAMPAIGN	)	AF# 4099
COMMITTEE, and SHEMANSKI, PHILIP	)	
L as treasurer;	)	
WASHOE COUNTY REPUBLICAN	)	AF# 4100
CENTRAL COMMITTEE, and MILLER,	)	
PATRICIA as treasurer;	)	
WOMEN VOTE SMART, and KREMER,	)	AF# 4101
AMY S as treasurer;	)	

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on March 19, 2021, the Commission took the following actions on the Reason To Believe Recommendation - 2020 30 Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated March 17, 2021, on the following committees:

AF#4066 Decided by a vote of 6-0 to: (1) find reason to believe that 43 ALUMNI FOR AMERICA, and KIRKSEY, KAREN 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#4067 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICA GREAT PAC, and JASON PALLANTE 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#4068 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN DIGNITY PAC, and SCHWENK, JAMES DIRK 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#4069 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#4070 Decided by a vote of 6-0 to: (1) find reason to believe that AMSTED INDUSTRIES INCORPORATED PAC, and LOPEZ, TRISTAN PAIGE 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#4071 Decided by a vote of 6-0 to: (1) find reason to believe that BATTLE FOR AMERICA PAC, and WOLFE, WINSTON 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#4072 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#4073 Decided by a vote of 6-0 to: (1) find reason to believe that CALUMET PAC, and BRONOWSKI, TERRY in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4074 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#4075 Decided by a vote of 6-0 to: (1) find reason to believe that COMMITTEE TO ELECT ROBERT J. LOVERO, and FELLOWS, MICHAEL W 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#4076 Decided by a vote of 6-0 to: (1) find reason to believe that CONSERVATIVE OPPORTUNITIES FOR A NEW AMERICA PAC, and BAIN, WILLIAM R. 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#4077 Decided by a vote of 6-0 to: (1) find reason to believe that DEMOCRATIC FOUNDATION OF ORANGE COUNTY, and HATTON, GLEN 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#4078 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#4079 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#4080 Decided by a vote of 6-0 to: (1) find reason to believe that FUTURE GENERATIONS, and LEGAULT, JEANNE E 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.

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AF#4081 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 letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4082 Decided by a vote of 6-0 to: (1) find reason to believe that LV STRONG, and NICHOLAS, CHRISTOPHER 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#4083 Decided by a vote of 6-0 to: (1) find reason to believe that MASSACHUSETTS BANKERS PAC-FEDERAL FUND, and KILEY, KEVIN F 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#4084 Decided by a vote of 6-0 to: (1) find reason to believe that MSCPAC, and STEVE MARKOSKY 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#4085 Decided by a vote of 6-0 to: (1) find reason to believe that NATURAL PRODUCTS ASSOCIATION POLITICAL ACTION COMMITTEE, and DAN FABRICANT 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#4086 Decided by a vote of 6-0 to: (1) find reason to believe that NEVADA COUNTY REPUBLICAN PARTY, and FRANCES J FREEDLE 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#4087 Decided by a vote of 6-0 to: (1) find reason to believe that NIAC ACTION PAC, and ABDI, JAMAL 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#4088 Decided by a vote of 6-0 to: (1) find reason to believe that OKLAHOMA LEADERSHIP COUNCIL, and MCCUTCHIN, MICHAEL G 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#4089 Decided by a vote of 6-0 to: (1) find reason to believe that ONLY IF YOU RUN, and REBECCA BERWICK 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#4090 Decided by a vote of 6-0 to: (1) find reason to believe that PEOPLE POWERED ACTION, and PULID O, GWENDOLYN 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#4091 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#4092 Decided by a vote of 6-0 to: (1) find reason to believe that REGULAR PEOPLE, and BLUM, PAUL 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#4093 Decided by a vote of 6-0 to: (1) find reason to believe that SALVEMOS A PUERTO RICO, and FUENTES, JOSEPH in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter.

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

AF#4094 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.

AF#4095 Decided by a vote of 6-0 to: (1) find reason to believe that TFY PAC, and OBAYAN, OLUBUSOLA 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#4096 Decided by a vote of 6-0 to: (1) find reason to believe that THE PETER NORBECK LEADERSHIP PAC, and GRAY, BOB 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#4097 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#4098 Decided by a vote of 6-0 to: (1) find reason to believe that UNITED AMERICAN VETERANS PAC, and MONVILLE, BRYAN JAMES 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#4099 Decided by a vote of 6-0 to: (1) find reason to believe that VISUAL DISOBEDIENCE CAMPAIGN COMMITTEE, and SHEMANSKI, PHILIP L 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.

Federal Election Commission  
Certification for Administrative Fines  
March 19, 2021

Page 9

AF#4100 Decided by a vote of 6-0 to: (1) find reason to believe that WASHOE COUNTY REPUBLICAN CENTRAL COMMITTEE, and MILLER, PATRICIA 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#4101 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.



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April 7, 2021

Date

Attest:

Laura  
Sinram

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Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission

Digitally signed by  
Laura Sinram  
Date: 2021.04.07  
13:28:28 -04'00'



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

April 9, 2021

Jeanne E. Legault, in official capacity as Treasurer  
Future Generations  
2518 S Brandon Ct.  
Seattle, WA 98108

C00749861

AF#: 4080

Dear Ms. Legault,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2020 through November 23, 2020 shall be filed no later than December 3, 2020. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on January 1, 2021, 29 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 March 19, 2021, the FEC found that there is reason to believe ("RTB") that Future Generations 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 December 3, 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 \$4,977. 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 \$4,977 is due within forty (40) days of the finding, or by April 28, 2021, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$75,250  
Number of Days Late: 29  
Number of Previous Civil Money Penalties Assessed: 0

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

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

If you should decide to challenge the RTB finding and/or calculated civil money



## FUTURE GENERATIONS

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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 April 28, 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).

## FUTURE GENERATIONS

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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 Future Generations and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

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

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

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

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

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

**5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will

## FUTURE GENERATIONS

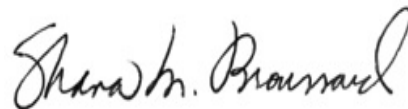
Page 4 of 5

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

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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 \$4,977 for the Post-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 collections. Visit [www.fec.gov/af/pay.shtml](https://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 Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

FUTURE GENERATIONS

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COMMITTEE NAME: Future Generations

FEC ID#: C00749861

AF#: 4080

PAYMENT DUE DATE: April 28, 2021

PAYMENT AMOUNT DUE: \$4,977

Jeanne E. Legault, in official capacity as Treasurer Future Generations 2518 S Brandon Ct. Seattle, WA 98108 C00749861 AF#: 4080

COMMITTEE NAME: Future Generations FEC ID#: C00749861 AF#: 4080

"Dear Ms. Legault, The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30 Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2020 through November 23, 2020 shall be filed no later than December 3, 2020. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on January 1, 2021, 29 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 March 19, 2021, the FEC found that there is reason to believe ("RTB") that Future Generations 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 December 3, 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 \$4,977. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55."

This is my official challenge:

You cannot know what you don't know. I had made every effort to find out any changes to filing since I had been a federal treasurer 18 years ago. However, that information is not available without paying a fee for a seminar – a fee I could not afford. I made endless calls to support for help and only received one call back from an extremely rude woman who was unwilling to help me in my confusion about filing periods. These had clearly changed since I had been a treasurer and I was completely confused. At the end of the year, I filed the final report and since there was no further activity after early November, I believed that we were done. I had no idea that a duplicate report had to be filed. Now I know that you say ignorance is no excuse, but there simply was no way for me to acquire the information I needed. I tried every way I could – researching, calling for help, calling other treasurers. So now I am being made to pay an enormous fine. There is no way in heaven I could possibly pay this fine. And the committee no longer exists so it is all on me. I am on Social Security and it would take me years to pay this off. I am beside myself with worry and fear. Please consider my herculean efforts to find out if I needed to do anything further following our last report. After all – there was no information that was not filed – so no one could possibly have been damaged by this. I am being fined for failing to file a report with nothing on it! \$5,000 is half of what I live on in a year! I am beseeching you to find a way to be more lenient with me. Thank you for your consideration.

Yours truly,



Jeanne Legault



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 1, 2021

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

AF# 4080 – Future Generations and Jeanne E. Legault, in her official capacity as Treasurer (C00749861)

### **Summary of Recommendation**

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$4,977 civil money penalty.

### **Reason-to-Believe Background**

The 2020 Post-General Report was due on December 3, 2020. The respondents filed the activity for the coverage period on January 1, 2021, 29 days late. The report is not election sensitive and was filed within 30 days of the due date; therefore, the report is considered late. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On March 19, 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 Post-General Report and made a preliminary determination that the civil money penalty was \$4,977 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents’ email address of record from the Reports Analysis Division (“RAD”) on April 9, 2021 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 committee not authorized by a candidate shall file a post-general report covering through the 20<sup>th</sup> day after the election no later than 30 days after the election. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(1)(iii). 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).



## Summary of Respondents' Challenge

On May 19, 2021, the Commission received the written response (“challenge”) from the Treasurer. She explains that she was a Treasurer 18 years ago and attempted to learn current filing requirements. However, she could only receive this information by attending an FEC seminar, which she could not afford. She made multiple attempts to contact the FEC for support, but “only received one call back from an extremely rude woman who was unwilling to help me in my confusion about filing periods.”

The Treasurer further explains that there was no activity after November 2020, and she believed she had filed the final report at the end of the year. She was not aware that she had to continue filing. The Treasurer stresses that she tried to obtain the necessary information any way she could by “...researching, calling for help, calling other treasurers.”

The Treasurer requests leniency from the Commission. She highlights that the Committee is being penalized for a report with no activity, and “there was no information that was not filed.” In addition, the Treasurer indicates the Committee is inactive and personally paying the penalty would be an extreme financial burden.

## Analysis

The Reviewing Officer recognizes the Committee may have become inactive after November 2020. However, the 2020 Post-General reporting period began October 1, 2020, at least one month prior to the Committee becoming inactive. Moreover, a committee’s filing obligation ends only when a committee files a termination report, and the Commission notifies them in writing that their termination report has been accepted.<sup>1</sup> 11 C.F.R. § 102.3; *Campaign Guide for Nonconnected Committees*, 93.

Further, while the Treasurer contends the Committee had no activity for the report in question, Commission records indicate otherwise. On January 1, 2021, the Committee filed the 2020 Year-End Report covering the period of October 1, 2020 through December 31, 2020. This report included the coverage period of the 2020 Post-General Report (October 1, 2020 through November 23, 2020).<sup>2</sup> At RTB, RAD calculated the level of activity for the 2020 Post-General Report coverage period to be \$75,250.<sup>3</sup>

The Treasurer also indicates she may not have been aware of the Committee’s requirement to file the 2020 Post-General Report. However, Commission records indicate she was notified and reminded of this reporting requirement multiple times. On October 1, 2020, the Commission’s Information Division sent the 2020 General Election Prior Notice to [jeannelegault@aol.com](mailto:jeannelegault@aol.com), the

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<sup>1</sup> To date, the Committee has not yet filed a Termination Report.

<sup>2</sup> On January 31, 2021, the Committee filed an Amended 2020 Year-End Report disclosing no changes in total receipts or disbursements.

<sup>3</sup> This calculation includes the sum of all itemized receipts and disbursements that should have been disclosed on the 2020 Post-General Report plus a per diem level of unitemized activity.

email address listed on the Committee's Statement of Organization. The notice included pre- and post-election reporting requirements, including the 2020 Post-General Report. On November 9, 2020, the Information Division sent a separate email notification to [jeannelegault@aol.com](mailto:jeannelegault@aol.com), specifically reminding the committee of the 2020 Post-General Report. On November 30, 2020, the Commission's Electronic Filing Office ("EFO") sent a reminder email regarding the 2020 Post-General Report to [jeannelegault@aol.com](mailto:jeannelegault@aol.com). On December 4, 2020, the day following the filing deadline, EFO sent a late notification email to the same email address because the report had not yet been filed. On December 18, 2020, RAD sent the non-filer notification via email to [jeannelegault@aol.com](mailto:jeannelegault@aol.com).

The Treasurer also contends she made multiple attempts to receive reporting assistance, but she was only called back once and feels that attending an FEC seminar is the only way to receive reporting guidance. Commission records do indicate that the Treasurer has contacted RAD and EFO multiple times for reporting assistance. On July 1, 2020, the Treasurer used the contact form on the FEC website to submit a question to RAD. Through RAD's "Submit a Question" feature, she wrote: "...As we are just newly filed, the Director and I (the treasurer) have a number of questions about filing for this PAC. Could we set up a phone conference with you to review these?" On July 2, 2020, the RAD Analyst responded to the Treasurer's inquiry by providing his direct phone number and offering to set up a time for discussion. The Analyst also encouraged the Treasurer to contact the Information Division for questions related to campaign finance laws or FEC trainings. In addition, the Analyst also provided the website links for the applicable reporting schedule and filing resources.

The Analyst subsequently provided assistance to the Committee on two occasions in July 2020. On October 12, 2020, the Treasurer left voicemails with EFO requesting assistance with a FECFile software update. EFO made multiple attempts to return the Treasurer's call that same day, but each time, the call was not answered and EFO was unable to leave a voicemail. On October 13, 2020, the following day, EFO was able to assist the Treasurer with updating FECFile to the new version. On October 14, 2020, the Treasurer again contacted EFO and left a voicemail explaining that she was getting validation errors when attempting to file the Committee's 2020 October Quarterly Report. EFO returned her call that same day and left a voicemail.

Then, on December 23, 2020, the Treasurer left the RAD Analyst a voicemail regarding the requirement to file the 2020 Post-General Report. The RAD Analyst returned her call and left a voicemail confirming the Committee's requirement to file the report, which was previously due December 3, 2020. The Treasurer again contacted the RAD Analyst that day for assistance with creating the report. Ultimately, the RAD Analyst transferred the call to EFO so that the Treasurer could request assistance with merging the Committee's FECFile data files. The Treasurer left a voicemail for EFO, and EFO returned her call that same day and left a voicemail. On December 28, 2020, the Committee contacted EFO multiple times for assistance with filing. Each time, the Treasurer left a voicemail for EFO, and EFO subsequently returned her calls. EFO either provided the necessary assistance or the Treasurer had already resolved the issue initially raised. EFO also advised the Treasurer to contact RAD for questions related to reporting dates.

The Reviewing Officer recognizes the Treasurer needed Commission support to understand the Committee's filing requirements and use FECFile. However, Commission records indicate Commission staff provided timely and adequate support to the Committee. Moreover, treasurer

inexperience and failure to use filing software properly are specifically included at 11 C.F.R. § 111.35(d) as examples 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) and assess a civil money penalty of \$4,977.

### **OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4080 involving Future Generations and Jeanne E. Legault, in her official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4080 that Future Generations and Jeanne E. Legault, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$4,977 civil money; and
3. Send the appropriate letter.

### **Attachments**

Attachment 1 –  
Attachment 2 – Page 93 of *Campaign Guide for Nonconnected Committees*  
Attachment 3 –  
Attachment 4 –  
Attachment 5 – Declaration from RAD  
Attachment 6 – Declaration from OAR

## CHAPTER 11

# Termination and Debt Settlement

### I. Committees with No Outstanding Debts

A nonconnected committee may terminate its registration and reporting obligations at any time by filing a termination report, provided that:

- The committee no longer intends to receive contributions or make expenditures;
- The committee has no outstanding debts or obligations (102.3); and
- The committee is not involved in an enforcement action (MUR), an audit or litigation with the FEC.

### Termination Report

When filing a termination report, the treasurer checks the “Termination Report” box on Line 4(a) of the Summary Page of Form 3X.

The termination report must disclose:

- All receipts and disbursements not previously reported, including an accounting of debt retirement; and
- The purposes for which any remaining committee funds will be used. 102.3(a).

The committee’s reporting obligation does not end until the Commission notifies the committee that the termination report has been accepted. Merely filing a termination report does not terminate the committee’s reporting requirements. The Commission must accept the termination report before the committee may cease filing reports.

### Disposal of Remaining Funds

A committee may use its remaining funds for any lawful purposes, including refunding them to their donors or donating them to charity. See AOs 1992-10, 1991-21, 1986-32, 1983-4 and 1979-42.

### 2. Committees with Outstanding Debts: Debt Settlement

#### Eligibility for Debt Settlement

A committee that has outstanding debts but wants to terminate may settle its debts for less than the full amount owed to the creditors. This option is available only to a terminating committee—i.e., a committee which no longer intends to support candidates and which receives contributions and makes expenditures only for the purpose of paying winding-down administrative expenses (if any) and retiring debts. 116.1(a) and 116.2(a).

An ongoing committee—i.e., a committee that does not qualify as a terminating committee—is not eligible for debt settlement and must continuously report debts until they are extinguished. 104.3(d), 116.1(b) and 116.2(b).

#### Debt Settlement Rules

A commercial vendor (incorporated or unincorporated) may forgive or settle debts owed by a committee without incurring a contribution if:

- Credit was initially extended in the ordinary course of business, and the terms of the credit are similar to those observed by the vendor when extending a similar amount of credit to a nonpolitical client of similar risk and size of obligation. 116.3 and 116.4(d)(1);
- The committee undertook all reasonable efforts to satisfy the outstanding debt, such as fundraising, reducing overhead costs and liquidating assets. 116.4(d)(2); and
- The vendor made the same efforts to collect the debt as those made to collect debts from a nonpolitical debtor in similar circumstances. Remedies might include, for example, late fee charges, referral to a debt collection agency or

## 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 Future Generations:
  - A) Non-Filer Letter, dated December 18, 2020, referencing the 2020 30-Day Post-General Report (sent via electronic mail to: [jeannelegault@aol.com](mailto:jeannelegault@aol.com));
  - B) Reason-to-Believe Letter, dated April 9, 2021, referencing the 2020 30-Day Post-General Report (sent via electronic mail to: [jeannelegault@aol.com](mailto:jeannelegault@aol.com)).
4. I hereby certify that I have searched the Commission's public records and find that Future Generations filed the 2020 Year-End Report, which included the coverage dates for the 2020 30-Day Post-General Report, with the Commission on January 1, 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 25<sup>th</sup> day of June, 2021.

*Kristin D. Roser*

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

December 18, 2020

LEGAULT, JEANNE E LEGAULT, TREASURER  
FUTURE GENERATIONS  
2518 S BRANDON CT  
APT, SUITE, BLDG. (OPTIONAL)  
SEATTLE, WA 98108

IDENTIFICATION NUMBER: C00749861

REFERENCE: POST-GENERAL REPORT (10/01/2020 - 11/23/2020)

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. The report must be filed 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. If you have already filed the report by express, certified or registered mail, please notify us immediately of the certified, registered or express tracking number and the date that the report was sent.

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).



## FUTURE GENERATIONS

Page 2 of 2

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report.

If you have any questions regarding this matter, please contact Ben Holly in the Reports Analysis Division on our toll-free number (800)424-9530. The analyst's direct number is (202)694-1129.

Sincerely,

A handwritten signature in black ink that reads "Debbie Chacona". The script is cursive and fluid.

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 committee not authorized by a candidate shall file a post-general report covering through the 20<sup>th</sup> day after the election no later than 30 days after the election. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on December 3, 2020 for the 2020 Post-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, Summary, and Detailed Summary Pages of the 2020 Year-End Report filed by Future Generations. The report includes the coverage period of October 1, 2020 through December 31, 2020 and was electronically filed on January 1, 2021.
  - b) Cover, Summary, and Detailed Summary Pages of the Amended 2020 Year-End Report filed by Future Generations. The report includes the coverage period of October 1, 2020 through December 31, 2020 and was electronically filed on January 31, 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 July, 2021.

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

**FEC  
FORM 3P****REPORT OF RECEIPTS  
AND DISBURSEMENTS**BY AN AUTHORIZED COMMITTEE OF A CANDIDATE  
FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT

Office Use Only

1. NAME OF COMMITTEE (in full, type or print)

Example: If typing, type over the lines.

12FE4M5

My Committee

ADDRESS (number and street)

2518 S Brandon Ct

Check if different  
than previously  
reported. (ACC)

Seattle

CITY

WA  
STATE

98108

ZIP CODE

2. FEC IDENTIFICATION NUMBER

C

C00749861

3. TYPE OF REPORT (Choose One)

Check here if this is a Termination Report (TER) ☐

Quarterly Reports:

Monthly Reports:

- ☐ April 15 (Q1) ☐ October 15 (Q3) ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11)  
☐ July 15 (Q2) ☒ January 31 Year-End Report (YE) ☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12)  
☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

- ☐ 12-Day Pre-Election Report for the Election on ☐ 30-Day Post-Election Report for the General Election on  
 M M / D D / Y Y Y Y Y Y in the State of  M M / D D / Y Y Y Y Y Y

4. IS THIS REPORT AN AMENDMENT?

☒ yes  
☐ no

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  
 12 / 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.

Type or Print Name of Treasurer

Legault, Jeanne, , ,

Signature of Treasurer

Legault, Jeanne, , ,

[Electronically Filed]

Date

 M M / D D / Y Y Y Y Y Y  
 01 / 31 / 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.  
All previous versions of this form are obsolete and should no longer be used.

Office  
Use  
Only

Write or Type Committee Name

**My Committee**

Report Covering the Period:

From:

M M  
10/ D D  
01/ Y Y Y Y  
2020

To:

M M  
12/ D D  
31/ Y Y Y Y  
2020**SUMMARY**

6. CASH ON HAND AT BEGINNING OF REPORTING PERIOD .....	0.00
7. TOTAL RECEIPTS THIS PERIOD (From Line 22, Column A, Page 3) .....	45700.51
8. SUBTOTAL (Lines 6 and 7) .....	45700.51
9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30, Column A, Page 4) .....	34871.64
10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8).....	10828.87
11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C-P or Schedule D-P).....	0.00
12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C-P or Schedule D-P).....	0.00
13. EXPENDITURES SUBJECT TO LIMITATION (Use the worksheet on Page 8 to calculate this amount.).....	0.00

**NET ELECTION CYCLE-TO-DATE CONTRIBUTIONS AND EXPENDITURES**

14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d, Column B on Page 4 from 17e, Column B on Page 3).....	44498.40
15. NET OPERATING EXPENDITURES (Subtract Line 20a, Column B on Page 3 from 23, Column B on Page 4) .....	34850.07

# **DETAILED SUMMARY PAGE** of Receipts

FEC Form 3P (Rev. 05/2016)

PAGE 3 / 42

NAME OF COMMITTEE (in Full)

My Committee

Report Covering the Period:

From:

M M / D D / Y Y Y Y  
10 / 01 / 2020

To:

M M / D D / Y Y Y Y  
12 / 31 / 2020**I. RECEIPTS****COLUMN A**  
Total This Period**COLUMN B**  
Election Cycle-to-Date

16. FEDERAL FUNDS (Itemize on Schedule A-P).....	0.00	0.00
17. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) itemized .....	15879.64	15879.64
(ii) unitemized .....	5721.20	5721.20
(iii) Total contributions .....	21600.84	21600.84
(b) Political Party Committees .....	0.00	0.00
(c) Other Political Committees .....	22897.56	22897.56
(d) The Candidate .....	0.00	0.00
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d)) .....	44498.40	44498.40
18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....	1174.00	1174.00
19. LOANS RECEIVED:		
(a) Loans Received From or Guaranteed by Candidate .....	0.00	0.00
(b) Other Loans .....	0.00	0.00
(c) TOTAL LOANS (Add 19(a) and 19(b)) .....	0.00	0.00
20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):		
(a) Operating .....	0.00	0.00
(b) Fundraising .....	0.00	0.00
(c) Legal and Accounting .....	0.00	0.00
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c)) .....	0.00	0.00
21. OTHER RECEIPTS (Dividends, Interest, etc.) .....	28.11	28.11
22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21) .....	45700.51	45700.51

# **DETAILED SUMMARY PAGE** of Disbursements and Contributed Items

FEC Form 3P (Rev. 05/2016)

PAGE 4 / 42

NAME OF COMMITTEE (in Full)

My Committee

Report Covering the Period:

From:

M	M	/	D	D	/	Y	Y	Y	Y
10			01			2020			

To:

M	M	/	D	D	/	Y	Y	Y	Y
12			31			2020			

**II. DISBURSEMENTS**
**COLUMN A**  
Total This Period

**COLUMN B**  
Election Cycle-to-Date

23. OPERATING EXPENDITURES.....	34850.07	34850.07
24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....	0.00	0.00
25. FUNDRAISING DISBURSEMENTS .....	0.00	0.00
26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS.....	0.00	0.00
27. LOAN REPAYMENTS MADE:		
(a) Repayments of Loans made or Guaranteed by Candidate.....	0.00	0.00
(b) Other Repayments .....	0.00	0.00
(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b)) .....	0.00	0.00
28. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees.....	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees .....	0.00	0.00
(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c)) .....	0.00	0.00
29. OTHER DISBURSEMENTS .....	21.57	21.57
30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29) .....	34871.64	34871.64

**III. CONTRIBUTED ITEMS**  
(Stock, Art Objects, Etc.)

31. ITEMS ON HAND TO BE LIQUIDATED (Attach List) .....	0.00	
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**FEC  
FORM 3P****REPORT OF RECEIPTS  
AND DISBURSEMENTS**BY AN AUTHORIZED COMMITTEE OF A CANDIDATE  
FOR THE OFFICE OF PRESIDENT OR VICE PRESIDENT

Office Use Only

**1. NAME OF COMMITTEE** (in full, type or print)

Example: If typing, type over the lines.

12FE4M5

My Committee

**ADDRESS** (number and street)

2518 S Brandon Ct

Check if different  
than previously  
reported. (ACC)

Seattle

CITY

WA  
STATE

98108

ZIP CODE

**2. FEC IDENTIFICATION NUMBER**

C

C00749861

**3. TYPE OF REPORT** (Choose One)Check here if this is a Termination Report (TER) ☐Quarterly Reports:Monthly Reports:

- ☐ April 15 (Q1)   ☐ October 15 (Q3)   ☐ Feb 20 (M2)   ☐ May 20 (M5)   ☐ Aug 20 (M8)   ☐ Nov 20 (M11)  
☐ July 15 (Q2)   ☒ January 31 Year-End Report (YE)   ☐ Mar 20 (M3)   ☐ Jun 20 (M6)   ☐ Sep 20 (M9)   ☐ Dec 20 (M12)  
☐ Apr 20 (M4)   ☐ Jul 20 (M7)   ☐ Oct 20 (M10)   ☐ Jan 31 (YE)

- ☐ 12-Day Pre-Election Report for the Election on ☐ 30-Day Post-Election Report for the General Election on  
 /  /  in the State of   /  /

**4. IS THIS REPORT AN AMENDMENT?**
☒ yes  
☐ no
**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

Legault, Jeanne, , ,

Signature of Treasurer

Legault, Jeanne, , ,

[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.  
All previous versions of this form are obsolete and should no longer be used.

Office  
Use  
Only

Write or Type Committee Name

**My Committee**

Report Covering the Period:

From:

M M / D D / Y Y Y Y Y  
10 01 2020

To:

M M / D D / Y Y Y Y Y  
12 31 2020**SUMMARY**

6. CASH ON HAND AT BEGINNING OF REPORTING PERIOD .....	0.00
7. TOTAL RECEIPTS THIS PERIOD (From Line 22, Column A, Page 3) .....	45700.51
8. SUBTOTAL (Lines 6 and 7) .....	45700.51
9. TOTAL DISBURSEMENTS THIS PERIOD (From Line 30, Column A, Page 4) .....	34871.64
10. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 9 from 8).....	10828.87
11. DEBTS AND OBLIGATIONS OWED TO THE COMMITTEE (Itemize All on Schedule C-P or Schedule D-P).....	0.00
12. DEBTS AND OBLIGATIONS OWED BY THE COMMITTEE (Itemize All on Schedule C-P or Schedule D-P).....	0.00
13. EXPENDITURES SUBJECT TO LIMITATION (Use the worksheet on Page 8 to calculate this amount.).....	0.00

**NET ELECTION CYCLE-TO-DATE CONTRIBUTIONS AND EXPENDITURES**

14. NET CONTRIBUTIONS (Other than Loans) (Subtract Line 28d, Column B on Page 4 from 17e, Column B on Page 3).....	44498.40
15. NET OPERATING EXPENDITURES (Subtract Line 20a, Column B on Page 3 from 23, Column B on Page 4) .....	34850.07

**DETAILED SUMMARY PAGE**  
of Receipts

FEC Form 3P (Rev. 05/2016)

PAGE 3 / 42

NAME OF COMMITTEE (in Full)

My Committee

Report Covering the Period:

From:

M M / D D / Y Y Y Y  
10 / 01 / 2020

To:

M M / D D / Y Y Y Y  
12 / 31 / 2020

I. RECEIPTS		COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
16. FEDERAL FUNDS (Itemize on Schedule A-P) .....		0.00	0.00
17. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) itemized .....	15879.64	15879.64	
(ii) unitemized .....	5721.20	5721.20	
(iii) Total contributions .....	21600.84	21600.84	
(b) Political Party Committees .....	0.00	0.00	
(c) Other Political Committees .....	22897.56	22897.56	
(d) The Candidate .....	0.00	0.00	
(e) TOTAL CONTRIBUTIONS (other than loans) (Add 17(a), 17(b), 17(c) and 17(d)) .....	44498.40	44498.40	
18. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES .....	1174.00	1174.00	
19. LOANS RECEIVED:			
(a) Loans Received From or Guaranteed by Candidate .....	0.00	0.00	
(b) Other Loans .....	0.00	0.00	
(c) TOTAL LOANS (Add 19(a) and 19(b)) .....	0.00	0.00	
20. OFFSETS TO EXPENDITURES (Refunds, Rebates, etc.):			
(a) Operating .....	0.00	0.00	
(b) Fundraising .....	0.00	0.00	
(c) Legal and Accounting .....	0.00	0.00	
(d) TOTAL OFFSETS TO EXPENDITURES (Add 20(a), 20(b) and 20(c)) .....	0.00	0.00	
21. OTHER RECEIPTS (Dividends, Interest, etc.) .....	28.11	28.11	
22. TOTAL RECEIPTS (Add 16, 17(e), 18, 19(c), 20(d) and 21) .....	45700.51	45700.51	

**DETAILED SUMMARY PAGE**

FEC Form 3P (Rev. 05/2016)

of Disbursements and Contributed Items

PAGE 4 / 42

NAME OF COMMITTEE (in Full)

My Committee

Report Covering the Period:

From:

M M / D D / Y Y Y Y  
10 / 01 / 2020

To:

M M / D D / Y Y Y Y  
12 / 31 / 2020**II. DISBURSEMENTS****COLUMN A**  
Total This Period**COLUMN B**  
Election Cycle-to-Date

23. OPERATING EXPENDITURES.....	34850.07	34850.07
24. TRANSFERS TO OTHER AUTHORIZED COMMITTEES .....	0.00	0.00
25. FUNDRAISING DISBURSEMENTS .....	0.00	0.00
26. EXEMPT LEGAL AND ACCOUNTING DISBURSEMENTS.....	0.00	0.00
27. LOAN REPAYMENTS MADE:		
(a) Repayments of Loans made or Guaranteed by Candidate.....	0.00	0.00
(b) Other Repayments .....	0.00	0.00
(c) TOTAL LOAN REPAYMENTS MADE (Add 27(a) and 27(b)) .....	0.00	0.00
28. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees.....	0.00	0.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees .....	0.00	0.00
(d) TOTAL CONTRIBUTION REFUNDS (Add 28(a), 28(b) and 28(c)) .....	0.00	0.00
29. OTHER DISBURSEMENTS .....	21.57	21.57
30. TOTAL DISBURSEMENTS (Add 23, 24, 25, 26, 27(c), 28(d) and 29) .....	34871.64	34871.64

**III. CONTRIBUTED ITEMS**  
(Stock, Art Objects, Etc.)

31. ITEMS ON HAND TO BE LIQUIDATED (Attach List) .....	0.00	
---	------	--



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 2, 2021

Jeanne E. Legault, in official capacity as Treasurer  
Future Generations  
2518 S. Brandon Ct.  
Seattle, WA 98108

C00749861  
AF# 4080

Dear Ms. Legault:

On March 19, 2021, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Future Generations and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2020 Post-General Report. The Commission also made a preliminary determination that the civil money penalty was \$4,977 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 a civil money penalty. 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,

A handwritten signature in cursive script that reads "Rhiannon Magruder".

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review

---

**From:** Jeanne Legault <jeannelegault@aol.com>

**Sent:** Thursday, September 16, 2021 3:47 PM

**To:** Rhiannon Magruder <RMagruder@fec.gov>

**Subject:** Re: FEC Reviewing Officer Recommendation in AF# 4080 – Future Generations

Ilo Ms. Magruder,

Thank you for allowing me to respond.

To sum up my argument:

1. No damage was done. The fine was for failing to file a report that had zero activity in it. I can see if information was not reported. However, the "overdue" report was one that had absolutely nothing to report.
2. I am used to filing in the State of Washington. Here, if we have no activity, we are not required to report anything. I wanted to find out how to close out the account. Despite scouring the handbook and googling on on-line, I could find no information. Therefore, I phoned my filing assistant. I must have left at least 8 messages but never received a reply back. I wrongly assumed that if there was no response, I was doing it correctly.
3. Had someone notified me shortly after the report (of nothing) was due, I could have filed it immediately as there was nothing to report. However, it wasn't until April.
4. As of December 31, 2020, I was no longer the treasurer of record.
5. The fine of \$5.000 seems really prohibitive for a treasurer.

So the end result would be the same as if you wrote this off. I made a good faith effort to follow the rules and do not deserve this kind of egregious punishment for failing to file a "non" report when I was no longer the treasurer.

So much for volunteering. They say no good deed goes unpunished.

Yours truly,

Jeanne Legault





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

September 21, 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# 4080 – Future Generations and Jeanne E. Legault, in their official capacity as Treasurer (C00749861)

On March 19, 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 Post-General Report and made a preliminary determination that the civil money penalty was \$4,977 based on the schedule of penalties at 11 C.F.R. § 111.43. On May 19, 2021, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated July 1, 2021 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer confirmed the calculation of the civil money penalty at RTB was correct. The Reviewing Officer also recognized the Treasurer needed Commission support to understand the Committee’s filing requirements and usage of FECFile software. However, Commission records indicate Commission staff provided timely and adequate support to the Committee. Moreover, treasurer inexperience and failure to use filing software properly are specifically included at 11 C.F.R. § 111.35(d) as examples of a circumstance that will not be considered reasonably unforeseen and beyond the respondents’ control. Therefore, the Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$4,977.

Within 10 days of transmittal of the recommendation, the respondents 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). On September 16, 2021, the Treasurer submitted a response reiterating the points made in the original challenge and stressing her inability to personally pay the penalty. The Treasurer states she was no longer the

Treasurer of record as of December 31, 2020. However, according to Commission records to date, the Committee has not filed an Amended Statement of Organization (FEC Form 1) to designate a new Treasurer. The Reviewing Officer also notes that in the original challenge, the Treasurer mentioned that the Committee “no longer exists” and ended operations at the end of 2020. However, according to Commission records to date, the Committee has also not filed a termination report to request termination.

While sympathetic to the Treasurer’s financial hardships, the information received in the Committee’s response does not change the analysis or recommendations in the ROR. The Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a civil money penalty of \$4,977.

### **OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4080 involving Future Generations and Jeanne E. Legault, in their official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4080 that Future Generations and Jeanne E. Legault, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$4,977 civil money; and
3. Send the appropriate letter.

## BEFORE THE FEDERAL ELECTION COMMISSION

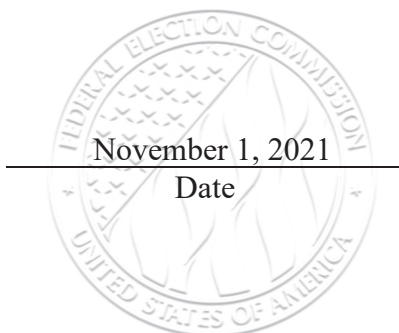
In the Matter of )  
 ) AF 4080  
 Final Determination Recommendation: )  
 Future Generations and Jeanne E. )  
 Legault, in their official capacity as )  
 Treasurer (C00749861) )

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on November 01, 2021, the Commission decided by a vote of 6-0 to take the following actions in AF# 4080:

1. Adopt the Reviewing Officer recommendation for AF# 4080 involving Future Generations and Jeanne E. Legault, in their official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 4080 that Future Generations and Jeanne E. Legault, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$4,977 civil money penalty.
3. Send the appropriate letter.

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



Attest:

**Laura e  
Sinram**

Laura E. Sinram  
 Acting Secretary and Clerk of the  
 Commission

Digitally signed by  
 Laura e Sinram  
 Date: 2021.11.01  
 11:50:16 -04'00'



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 4, 2021

Jeanne E. Legault, in official capacity as Treasurer  
Future Generations  
2518 S Brandon Ct.  
Seattle, WA 98108

C00749861  
AF# 4080

Dear Ms. Legault:

On March 19, 2021, the Federal Election Commission (“the Commission”) found reason to believe (“RTB”) that Future Generations and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file the 2020 Post-General Report. By letter dated April 9, 2021, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$4,977 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On May 19, 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 make a final determination that Future Generations and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assess a civil money penalty in the amount of \$4,977 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on July 2, 2021.

On November 1, 2021, the Commission adopted the Reviewing Officer’s recommendation and made a final determination that Future Generations and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$4,977. A copy of the Final Determination Recommendation is attached.

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

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

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during

the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

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

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

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

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

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

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

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

### **4. Partial Payments**

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

### **5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not

constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 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 the payment of the civil money penalty, 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".

Shana M. Broussard  
Chair

Attachment

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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 final determination is \$4,977 for the 2020 Post-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 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 Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

COMMITTEE NAME: Future Generations

FEC ID#: C00749861

AF#: 4080

PAYMENT AMOUNT DUE: \$4,977