



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

March 17, 2021

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

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

BY: Kristin D. Roser/Ben Holly  
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.

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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. §

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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.

Federal Election Commission  
Certification for Administrative Fines  
March 19, 2021

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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  
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March 19, 2021

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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**

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

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Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

April 9, 2021

Kevin F. Kiley, in official capacity as Treasurer  
 Massachusetts Bankers PAC-Federal Fund  
 One Washington Mall, 8th Floor  
 Boston, MA 02108

C00221507  
 AF#: 4083

Dear Mr. Kiley,

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 December 9, 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 March 19, 2021, the FEC found that there is reason to believe ("RTB") that Massachusetts Bankers PAC-Federal Fund 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 \$187. 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 \$187 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: \$10,912  
 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**

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

## MASSACHUSETTS BANKERS PAC-FEDERAL FUND

Page 2 of 5

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).

## MASSACHUSETTS BANKERS PAC-FEDERAL FUND

Page 3 of 5

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 Massachusetts Bankers PAC-Federal Fund 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

## MASSACHUSETTS BANKERS PAC-FEDERAL FUND

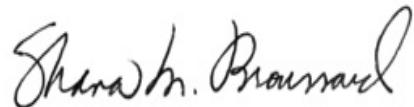
Page 4 of 5

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

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

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

On behalf of the Commission,



Shana M. Broussard  
Chair

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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 \$187 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)

MASSACHUSETTS BANKERS PAC-FEDERAL FUND

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694-1130.

COMMITTEE NAME: Massachusetts Bankers PAC-Federal Fund

FEC ID#: C00221507

AF#: 4083

PAYMENT DUE DATE: April 28, 2021

PAYMENT AMOUNT DUE: \$187

**RECEIVED**

By Office of the Commission Secretary at 11:13 am, Oct 20, 2021



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

October 20, 2021

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer AP by *KAH*  
Staff DirectorFROM: Patricia C. Orrock *PCO*  
Chief Compliance OfficerDebbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis DivisionBY: Kristin D. Roser/Jamie Sikorsky *JLS*  
Reports Analysis Division  
Compliance BranchSUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
2020 30-Day Post-General Report (Unauthorized 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 30-Day Post-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 entire 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, five (5) 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.

43 Alumni for America (AF 4066) disclosed no activity after the RTB finding (previously estimated to be \$40,363), which would result in no civil money penalty (fine previously assessed to be \$1,267).

American Pro-Israel PAC (AF 4069) disclosed no activity after the RTB finding (previously estimated to be \$137,162), which would result in no civil money penalty (fine previously assessed to be \$11,786).

Amsted Industries Incorporated PAC (AF 4070) filed the 2020 30-Day Post-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 \$5,066 (previously estimated to be \$44,761), thus the fine would be lowered from \$1,583 to \$527.

Bronx United (AF 4072) disclosed no federal activity after the RTB finding (previously estimated to be \$37,225), which would result in no civil money penalty (fine previously assessed to be \$1,267).

LV Strong (AF 4082) filed the 2020 Year-End Report, which covered the 2020 30-Day Post-General reporting period, 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 \$15,166 (previously estimated to be \$50,163), thus the fine would be lowered from \$4,041 to \$704.

For your information, three (3) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

Calumet PAC (AF 4073) filed an Amended Statement of Organization after the RTB finding designating Cynthia Lopez as Treasurer.

Oklahoma Leadership Council (AF 4088) filed an Amended Statement of Organization after the RTB finding designating Joe Hart as Treasurer.

The Peter Norbeck Leadership PAC (AF 4096) filed an Amended Statement of Organization after the RTB finding designating Jason Glodt as Treasurer.

## **RAD Recommendation**

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Make a final determination that the political committee and their treasurers, in their official capacity, listed on the attached report 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 POST-GENERAL Not Election Sensitive 12/03/2020 UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
4067	AMERICA GREAT PAC		C00705384	JASON PALLANTE	12/28/2020	25	\$300,669	0	3/19/2021	\$9,695	\$9,695	5/3/2021	\$9,695
4068	AMERICAN DIGNITY PAC		C00737296	JAMES DIRK SCHWENK	12/21/2020	18	\$15,298	0	3/19/2021	\$259	\$259	4/12/2021	\$259
4071	BATTLE FOR AMERICA PAC		C00696211	WINSTON WOLFE	12/28/2020	25	\$14,556	0	3/19/2021	\$301	\$301	5/3/2021	\$301
4074	CAMPAIGN TO SUPPORT THE PRESIDENT		C00697862	MATT TUNSTALL	12/16/2020	13	\$4,309	1	3/19/2021	\$142	\$142	4/14/2021	\$142
4079	FARMERS' RICE COOPERATIVE FUND		C00146605	BILL TANIMOTO	12/11/2020	8	\$10,000	2	3/19/2021	\$177	\$177	4/28/2021	\$177
4081	HOMETOWN VALUES PAC		C00721886	FRANCIS XAVIER HELGESEN	1/31/2021	*Not Filed	\$337	0	3/19/2021	\$337	\$337	7/15/2021	\$337
4083	MASSACHUSETTS BANKERS PAC-FEDERAL FUND		C00221507	KEVIN F. KILEY	12/9/2020	6	\$10,912	0	3/19/2021	\$187	\$187	4/23/2021	\$187
4087	NIAC ACTION PAC		C00710764	JAMAL ABDI	1/31/2021	*Not Filed	\$146,591	0	3/19/2021	\$6,735	\$6,735	4/26/2021	\$6,735
4088	OKLAHOMA LEADERSHIP COUNCIL		C00167213	JOE HART	12/22/2020	19	\$1,630,086	2	3/19/2021	\$12,984	\$12,984	4/21/2021	\$12,984
4090	PEOPLE POWERED ACTION	ROBERT BETO O'ROURKE	C00699090	GWENDOLYN PULIDO	12/20/2020	17	\$201,554	0	3/19/2021	\$5,933	\$5,933	4/23/2021	\$5,933
4096	THE PETER NORBECK LEADERSHIP PAC		C00571976	JASON GLODT	2/1/2021	*Not Filed	\$137,868	0	3/19/2021	\$6,735	\$6,735	4/28/2021	\$6,735
4099	VISUAL DISOBEDIENCE CAMPAIGN COMMITTEE		C00723148	PHILIP L. SHEMANSKI	12/18/2020	15	\$15,560	0	3/19/2021	\$241	\$241	6/1/2021	\$241

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

**Federal Election Commission**  
**FD Circulation Report Fine Not Paid**  
**2020 POST-GENERAL Not Election Sensitive 12/03/2020 UNAUTH**

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
4066	43 ALUMNI FOR AMERICA		C00747592	KAREN KIRKSEY		Not Filed	\$0	0	3/19/2021	\$1,267	215	NONE
4069	AMERICAN PRO-ISRAEL PAC		C00687657	JEANNE SULLIVAN		Not Filed	\$0	3	3/19/2021	\$11,786	215	NONE
4070	AMSTED INDUSTRIES INCORPORATED PAC		C00438358	TRISTAN PAIGE LOPEZ	4/6/2021	*Not Filed	\$5,066	1	3/19/2021	\$1,583	215	\$527
4072	BRONX UNITED		C00727065	RUSH PEREZ	9/29/2021	*Not Filed	\$0	0	3/19/2021	\$1,267	215	NONE
4073	CALUMET PAC		C00386300	CYNTHIA LOPEZ	1/31/2021	*Not Filed	\$200	0	03/19/2021	\$200	215	\$200
4076	CONSERVATIVE OPPORTUNITIES FOR A NEW AMERICA PAC		C00409458	WILLIAM BAIN	1/13/2021	*Not Filed	\$1,079	1	3/19/2021	\$438	215	\$438
4077	DEMOCRATIC FOUNDATION OF ORANGE COUNTY		C00176420	GLEN HATTON	1/31/2021	*Not Filed	\$12,156	0	3/19/2021	\$704	215	\$704
4078	DISTRICT 1199C NAT'L UNION OF HOSPITAL & HEALTH CARE EMPLOYEES POLITICAL ACTION FUND		C00034066	SALIMA PACE	12/10/2020	7	\$37,542	0	3/19/2021	\$494	215	\$494
4082	LV STRONG		C00743377	CHRISTOPHER NICHOLAS	8/12/2021	*Not Filed	\$15,166	0	3/19/2021	\$4,041	215	\$704
4084	MSCPAC		C00309468	STEVE MARKOSKY	1/25/2021	*Not Filed	\$14,341	0	3/19/2021	\$704	215	\$704
4085	NATURAL PRODUCTS ASSOCIATION POLITICAL ACTION COMMITTEE		C00297739	DAN FABRICANT	12/14/2020	11	\$3,049	0	3/19/2021	\$102	215	\$102
4089	ONLY IF YOU RUN		C00631192	REBECCA BERWICK	1/28/2021	*Not Filed	\$9,943	0	3/19/2021	\$422	215	\$422
4091	PEOPLE4AMERICA FEDERAL COMMITTEE		C00726224	BRIAN HERMAN	2/3/2021	*Not Filed	\$146,733	0	3/19/2021	\$6,735	215	\$6,735
4092	REGULAR PEOPLE		C00684555	PAUL BLUM	12/21/2020	18	\$245,227	0	3/19/2021	\$6,194	215	\$6,194
4093	SALVEMOS A PUERTO RICO		C00746594	JOSEPH FUENTES	5/25/2021	*Not Filed	\$977,114	0	3/19/2021	\$8,231	215	\$8,231
4095	TFY PAC		C00725994	OLUBUSOLA OBAYAN	12/17/2020	14	\$10,544	1	3/19/2021	\$293	215	\$293
4097	TOGETHER WE THRIVE		C00522458	CHRISTOPHER ZULLO		Not Filed	\$104,451 (est)	0	3/19/2021	\$6,735	215	\$6,735
4098	UNITED AMERICAN VETERANS PAC		C00656942	BRYAN JAMES MONVILLE	1/16/2021	*Not Filed	\$35,829	0	3/19/2021	\$1,267	215	\$1,267
4100	WASHOE COUNTY REPUBLICAN CENTRAL COMMITTEE		C00667592	PATRICIA MILLER	1/15/2021	*Not Filed	\$86,171	0	3/19/2021	\$5,237	215	\$5,237
4101	WOMEN VOTE SMART		C00616912	AMY S. KREMER		Not Filed	\$145,616 (est)	1	3/19/2021	\$8,418	215	\$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	)
	)
Administrative Fine Program – Final	)
Determination Recommendation for the	)
2020 30-Day Post-General Report	)
(Unauthorized Filers):	)
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 LOPEZ, CYNTHIA	) AF# 4073
as treasurer;	)
CAMPAIGN TO SUPPORT THE	) AF# 4074
PRESIDENT, and TUNSTALL, MATT 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;	)
HOMETOWN VALUES PAC, and	) AF# 4081
HELGESEN, FRANCIS XAVIER as	)
treasurer;	)
LV STRONG, and NICHOLAS,	) AF# 4082
CHRISTOPHER as treasurer;	)

Federal Election Commission  
Certification for Administrative Fines  
October 22, 2021

Page 2

MASSACHUSETTS BANKERS PAC-	) AF# 4083
FEDERAL FUND, and KILEY, KEVIN F	)
MR as treasurer;	)
MSPAC, and STEVE MARKOSKY as	) AF# 4084
treasurer;	)
NATURAL PRODUCTS ASSOCIATION	) AF# 4085
POLITICAL ACTION COMMITTEE, and	)
DAN FABRICANT as treasurer;	)
NIAC ACTION PAC, and ABDI, JAMAL	) AF# 4087
as treasurer;	)
OKLAHOMA LEADERSHIP COUNCIL,	) AF# 4088
and HART, JOE 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;	)
TFY PAC, and OBAYAN, OLUBUSOLA	) AF# 4095
as treasurer;	)
THE PETER NORBECK LEADERSHIP	) AF# 4096
PAC, and GLODT, JASON as treasurer;	)
TOGETHER WE THRIVE, and	) AF# 4097
CHRISTOPHER ZULLO as treasurer;	)
UNITED AMERICAN VETERANS PAC,	) AF# 4098
and MONVILLE, BRYAN JAMES as	)
treasurer;	)
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;	)

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CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on October 22, 2021 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2020 30-Day Post-General Report (Unauthorized Filers), as recommended in the Reports Analysis Division's Memorandum dated October 20, 2021, on the following committees:

AF#4066 Decided by a vote of 6-0 to: (1) make a final determination that 43 ALUMNI FOR AMERICA, and KIRKSEY, KAREN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4067 Decided by a vote of 6-0 to: (1) make a final determination that AMERICA GREAT PAC, and JASON PALLANTE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4068 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN DIGNITY PAC, and SCHWENK, JAMES DIRK in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4069 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN PRO-ISRAEL PAC, and SULLIVAN, JEANNE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4070 Decided by a vote of 6-0 to: (1) make a final determination that AMSTED INDUSTRIES INCORPORATED PAC, and LOPEZ, TRISTAN PAIGE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#4071 Decided by a vote of 6-0 to: (1) make a final determination that BATTLE FOR AMERICA PAC, and WOLFE, WINSTON in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4072 Decided by a vote of 6-0 to: (1) make a final determination that BRONX UNITED, and PEREZ, RUSH in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (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) make a final determination that CALUMET PAC, and LOPEZ, CYNTHIA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4074 Decided by a vote of 6-0 to: (1) make a final determination that CAMPAIGN TO SUPPORT THE PRESIDENT, and TUNSTALL, MATT in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4076 Decided by a vote of 6-0 to: (1) make a final determination that CONSERVATIVE OPPORTUNITIES FOR A NEW AMERICA PAC, and BAIN, WILLIAM R. MR. in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4077 Decided by a vote of 6-0 to: (1) make a final determination that DEMOCRATIC FOUNDATION OF ORANGE COUNTY, and HATTON, GLEN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#4078 Decided by a vote of 6-0 to: (1) make a final determination that DISTRICT 1199C NAT'L UNION OF HOSPITAL & HEALTH CARE EMPLOYEES POLITICAL ACTION FUND, and SALIMA PACE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4079 Decided by a vote of 6-0 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 Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4081 Decided by a vote of 6-0 to: (1) make a final determination that HOMETOWN VALUES PAC, and HELGESEN, FRANCIS XAVIER in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4082 Decided by a vote of 6-0 to: (1) make a final determination that LV STRONG, and NICHOLAS, CHRISTOPHER in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4083 Decided by a vote of 6-0 to: (1) make a final determination that MASSACHUSETTS BANKERS PAC-FEDERAL FUND, and KILEY, KEVIN F MR in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4084 Decided by a vote of 6-0 to: (1) make a final determination that MSCPAC, and STEVE MARKOSKY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4085 Decided by a vote of 6-0 to: (1) make a final determination that NATURAL PRODUCTS ASSOCIATION POLITICAL ACTION COMMITTEE, and DAN FABRICANT in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#4087 Decided by a vote of 6-0 to: (1) make a final determination that NIAC ACTION PAC, and ABDI, JAMAL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4088 Decided by a vote of 6-0 to: (1) make a final determination that OKLAHOMA LEADERSHIP COUNCIL, and HART, JOE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4089 Decided by a vote of 6-0 to: (1) make a final determination that ONLY IF YOU RUN, and REBECCA BERWICK in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4090 Decided by a vote of 6-0 to: (1) make a final determination that PEOPLE POWERED ACTION, and PULIDO, GWENDOLYN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4091 Decided by a vote of 6-0 to: (1) make a final determination that PEOPLE4AMERICA FEDERAL COMMITTEE, and HERMAN, BRIAN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4092 Decided by a vote of 6-0 to: (1) make a final determination that REGULAR PEOPLE, and BLUM, PAUL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4093 Decided by a vote of 6-0 to: (1) make a final determination that SALVEMOS A PUERTO RICO, and FUENTES, JOSEPH in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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AF#4095 Decided by a vote of 6-0 to: (1) make a final determination that TFY PAC, and OBAYAN, OLUBUSOLA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4096 Decided by a vote of 6-0 to: (1) make a final determination that THE PETER NORBECK LEADERSHIP PAC, and GLODT, JASON in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4097 Decided by a vote of 6-0 to: (1) make a final determination that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4098 Decided by a vote of 6-0 to: (1) make a final determination that UNITED AMERICAN VETERANS PAC, and MONVILLE, BRYAN JAMES in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4099 Decided by a vote of 6-0 to: (1) make a final determination that VISUAL DISOBEDIENCE CAMPAIGN COMMITTEE, and SHEMANSKI, PHILIP L in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4100 Decided by a vote of 6-0 to: (1) make a final determination that WASHOE COUNTY REPUBLICAN CENTRAL COMMITTEE, and MILLER, PATRICIA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

AF#4101 Decided by a vote of 6-0 to: (1) make a final determination that WOMEN VOTE SMART, and KREMER, AMY S in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

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Attest:

**Laura e  
Sinram**

Digitally signed by  
Laura e Sinram  
Date: 2021.10.27  
18:50:58 -04'00'

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Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

October 28, 2021

Kevin F. Kiley, in official capacity as Treasurer  
 Massachusetts Bankers PAC-Federal Fund  
 One Washington Mall, 8th Floor  
 Boston, MA 02108

C00221507  
 AF#: 4083

Dear Mr. Kiley,

On March 19, 2021, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Massachusetts Bankers PAC-Federal Fund and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2020 30-Day Post-General Report. By letter dated April 9, 2021, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$187 in accordance with the schedule of penalties at 11 CFR § 111.43.

On April 23, 2021, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on October 22, 2021 that Massachusetts Bankers PAC-Federal Fund and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$187 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.

On behalf of the Commission,

A handwritten signature in black ink, appearing to read "Shana M. Broussard".

Shana M. Broussard  
 Chair