



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

April 1, 2021

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

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

SUBJECT: Reason To Believe Recommendation – 2020 Year-End Report for the  
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2020 Year-End Report in accordance with 52 U.S.C. § 30104(a). The Year-End Report was due on January 31, 2021.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

In order to determine the level of activity for unauthorized quarterly filers that filed a Year-End Report and were required to but failed to file the 30 Day Post-General Report, the Reports Analysis Division (RAD) used the following procedures and criteria:

- 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 30 Day Post-General Report (30 Day Report). 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 YE fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a YE that covered the period from November 24, 2020 through December 31, 2020 (38 days). 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 41.30% (38 days (correct YE Filing Period)/92 days (submitted 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 YE.

### **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 YEAR-END Not Election Sensitive 01/31/2021 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4181	C00103861	S. C. BANKERS POLITICAL ACTION COMMITTEE		DONNA S. TAYLOR	\$108,053	0		Not Filed	\$15,436 (est)	\$704

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Reason To Believe Recommendation – )  
2020 Year-End Report for the )  
Administrative Fine Program: )

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S. C. BANKERS POLITICAL ACTION ) AF# 4181  
COMMITTEE, and DONNA S TAYLOR as )  
treasurer; )

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 05, 2021, the Commission took the following actions on the Reason To Believe Recommendation – 2020 Year-End Report for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated April 01, 2021, on the following committees:

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AF#4181      Decided by a vote of 4-0 to: (1) find reason to believe that S. C. BANKERS POLITICAL ACTION COMMITTEE, and DONNA S TAYLOR 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, and

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Weintraub voted affirmatively for the decision. Commissioners Trainor and Walther did not vote.

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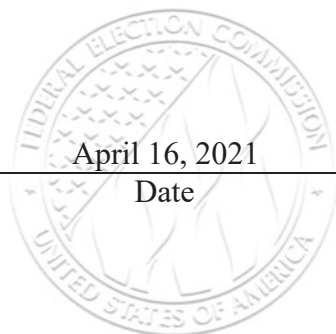


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Attest:

**Laura Sinram**

Digitally signed by  
Laura Sinram  
Date: 2021.04.16  
09:00:52 -04'00'

Laura E. Sinram  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

April 20, 2021

Donna S. Taylor, in official capacity as Treasurer  
S.C. Bankers Political Action Committee  
P.O. Box 1483  
Columbia, SC 29202

C00103861

AF#: 4181

Dear Ms. Taylor,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Year-End Report of Receipts and Disbursements every calendar year. This report, covering the period November 24, 2020 through December 31, 2020, shall be filed no later than January 31, 2021. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On April 5, 2021, the FEC found that there is reason to believe ("RTB") that S.C. Bankers Political Action Committee 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 January 31, 2021. 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 \$704. 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 \$704 is due within forty (40) days of the finding, or by May 15, 2021, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$15,436  
Number of Days Late: Not Filed  
Number of Previous Civil Money Penalties Assessed: 0

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

## S. C. BANKERS POLITICAL ACTION COMMITTEE

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

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 15, 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, the Federal Election Commission's office remains closed to visitors and most of its employees are continuing 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).

## S. C. BANKERS POLITICAL ACTION COMMITTEE

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

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

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

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

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

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

**5. Settlement Offers**

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

## S. C. BANKERS POLITICAL ACTION COMMITTEE

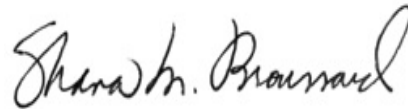
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acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money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

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

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

On behalf of the Commission,



Shana M. Broussard  
Chair

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ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$704 for the Year-End 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 Jacqueline Gausepohl in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press

S. C. BANKERS POLITICAL ACTION COMMITTEE

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5) or (202) 694-1130.

COMMITTEE NAME: S.C. Bankers Political Action Committee

FEC ID#: C00103861

AF#: 4181

PAYMENT DUE DATE: May 15, 2021

PAYMENT AMOUNT DUE: \$704



April 27, 2021

Via email: [administrativefines@FEC.GOV](mailto:administrativefines@FEC.GOV)

Federal Election Committee  
Office of Administrative Review

RE: SC Bankers Political Action Committee  
C 00103861  
AF # 4181

Dear Sir:

Our Federal PAC was assessed a \$704 fine for the late submission of the November 24, 2020 – December 31, 2020 filing. I would like to challenge this civil money penalty on the basis of unforeseen circumstances listed below.

- The PAC Treasurer, Donna S. Taylor, resigned abruptly on January 6, 2021;
- We could find no financial records that she maintained;
- We received a letter of February 17, 2021 notifying us of the late filing;
- I called Ben Holly in the reports analysis division and left a message explaining these circumstances;
- We hired a CPA firm to assist in reconstructing the financial records so that we could file;
- The report was completed and mailed by certified mail on 4/1/2021 (see attached);
- When we received the April 20 letter, I found we had not received confirmation that the US Postal Service Certified Mail Receipt was signed by the FEC (see attached);
- We humbly request the \$704 fine be rescinded based upon the circumstances described above. All future filings will be reported timely based on the process and procedures we have built;
- Donna S. Taylor is no longer the Treasurer of this Committee. I assume her role and responsibility of Treasurer.
- I have been unable to determine how to change your records and I hope this letter allows you to change the name of the Committee Treasurer.

Thank you for your consideration of this appeal.

Sincerely,

Fred L. Green II  
President and CEO

Attachments



7006 3450 0003 4412 4306

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
Washington, DC 20006	
Postage	\$ 42.00
Certified Fee	\$0.00
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 42.00
Postmark Here	
Date: 06/01/2006	
Sent To	Federal Election Commission
Street, Apt. No., or PO Box No.	1050 First Street, N.E.
City, State, ZIP+4	Washington, DC 20563
PS Form 3800, June 2006	

**FEC  
FORM 3X****REPORT OF RECEIPTS  
AND DISBURSEMENTS**  
For Other Than An Authorized Committee

Office Use Only

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

South Carolina Bankers Association Federal Political Action Committee

ADDRESS (number and street) **PO Box 1483**

Check if different than previously reported (ACC) **Columbia SC 29202**

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

**C** 00103861

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

**4. TYPE OF REPORT**

(Choose One)

(b) Monthly Report Due On

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)  
(Non-Election Year Only)

(a) Quarterly Reports

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)  
(Non-Election Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

April 15  
Quarterly Report (Q1)July 15  
Quarterly Report (Q2)October 15  
Quarterly Report (Q3)**X** January 31  
Year-End Report (YE)July 31 Mid-Year  
Report (Non-election  
Year Only) (MY)Termination Report  
(TER)(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

in the  
State of(d) 30-Day  
POST-Election  
Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the  
State of

5. Covering Period **11** **24** **2020** through **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

Signature of Treasurer

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.

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

# **SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

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Write or Type Committee Name

South Carolina Bankers Association Federal PAC

Report Covering the Period: From 11 24 2020 To: 12 31 2020

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2020		26,161.89
(b) Cash on Hand at Beginning of Reporting Period	34,807.07	
(c) Total Receipts (from Line 19)	500.00	33,238.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	35,307.07	59,399.89
7. Total Disbursements (from Line 31)	1,972.84	26,068.66
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	33,331.23	33,331.23
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		

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

## **For further information contact:**

Federal Election Commission  
1050 First Street, N.E.  
Washington, DC 20463

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

# **DETAILED SUMMARY PAGE** of Receipts

FEC Form 3X (Rev. 05/2016)

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Write or Type Committee Name

South Carolina Bankers Association Federal PAC

Report Covering the Period: From: 11 24 2020 To: 12 31 2020

I. Receipts	COLUMN A Total This Period		COLUMN B Calendar Year-to-Date	
11. Contributions (other than loans) From:				
(a) Individuals/Persons Other Than Political Committees				
(i) Itemized (use Schedule A) .....	500.00		14,590.00	
(ii) Unitemized .....			14,648.00	
(iii) TOTAL (add Lines 11(a)(i) and (ii)) .....			29,238.00	
(b) Political Party Committees .....				
(c) Other Political Committees (such as PACs) .....			4,000.00	
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5) .....	500.00		33,238.00	
12. Transfers From Affiliated/Other Party Committees .....				
13. All Loans Received .....				
14. Loan Repayments Received .....				
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5) .....				
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees .....				
17. Other Federal Receipts (Dividends, Interest, etc.) .....				
18. Transfers from Non-Federal and Levin Funds				
(a) Non-Federal Account (from Schedule H3) .....				
(b) Levin Funds (from Schedule H5) .....				
(c) Total Transfers (add 18(a) and 18(b)) .....				
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)) .....	500.00		33,238.00	
20. Total Federal Receipts (subtract Line 18(c) from Line 19) .....	500.00		33,238.00	

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev. 05/2016)

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II. Disbursements	COLUMN A Total This Period			COLUMN B Calendar Year-to-Date		
21. Operating Expenditures:						
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)						
(i) Federal Share .....	\$	0	0	\$	0	0
(ii) Non-Federal Share .....	\$	0	0	\$	0	0
(b) Other Federal Operating Expenditures .....	\$	0	351 84	\$	0	2 318 66
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	\$	0	351 84	\$	0	2 318 66
22. Transfers to Affiliated/Other Party Committees .....	\$	0	1 621 00	\$	0	23 750 00
23. Contributions to Federal Candidates/Committees and Other Political Committees .....	\$	0	0	\$	0	0
24. Independent Expenditures (use Schedule E) .....	\$	0	0	\$	0	0
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F) .....	\$	0	0	\$	0	0
26. Loan Repayments Made .....	\$	0	0	\$	0	0
27. Loans Made .....	\$	0	0	\$	0	0
28. Refunds of Contributions To:						
(a) Individuals/Persons Other Than Political Committees .....	\$	0	0	\$	0	0
(b) Political Party Committees .....	\$	0	0	\$	0	0
(c) Other Political Committees (such as PACs) .....	\$	0	0	\$	0	0
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)) .....	\$	0	0	\$	0	0
29. Other Disbursements (Including Non-Federal Donations) .....	\$	0	0	\$	0	0
30. Federal Election Activity (52 U.S.C. § 30101(20))						
(a) Allocated Federal Election Activity (from Schedule H6)						
(i) Federal Share .....	\$	0	0	\$	0	0
(ii) "Levin" Share .....	\$	0	0	\$	0	0
(b) Federal Election Activity Paid Entirely With Federal Funds .....	\$	0	0	\$	0	0
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) .....	\$	0	0	\$	0	0
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	\$	0	1 972 84	\$	0	26 068 66
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31) .....	\$	0	1 972 84	\$	0	26 068 66

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev. 05/2016)

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III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3) .....	0.00	0.00
34. Total Contribution Refunds (from Line 28(d)) .....	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33) .....	0.00	0.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....	0.00	0.00
37. Offsets to Operating Expenditures (from Line 15, page 3) .....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....	0.00	0.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....	351.84	2,318.66
38. Net Operating Expenditures (subtract Line 37 from Line 36) .....	351.84	2,318.66

**SCHEDULE A (FEC Form 3X)**  
**ITEMIZED RECEIPTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

FOR LINE NUMBER:		PAGE 1 OF 1	
(check only one)			
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
		<input type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

South Carolina Bankers Association Federal PAC

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name			Date of Receipt	
A. R Bruce White			11 16 2020	
Mailing Address			Amount of Each Receipt this Period	
650 Coleman Road			500.00	
City	State	Zip Code	Memo Item	
Travelers Rest	SC	29690		
FEC ID number of contributing federal political committee.				
C				
Name of Employer (for Individual)		Occupation (for Individual)		
Bank of Travelers Rest		Banker		
Receipt For:		Aggregate Year-to-Date ▼		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼				
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name			Date of Receipt	
B.				
Mailing Address			Amount of Each Receipt this Period	
City	State	Zip Code	Memo Item	
FEC ID number of contributing federal political committee.				
C				
Name of Employer (for Individual)		Occupation (for Individual)		
Receipt For:		Aggregate Year-to-Date ▼		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼				
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name			Date of Receipt	
C.				
Mailing Address			Amount of Each Receipt this Period	
City	State	Zip Code	Memo Item	
FEC ID number of contributing federal political committee.				
C				
Name of Employer (for Individual)		Occupation (for Individual)		
Receipt For:		Aggregate Year-to-Date ▼		
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼				
SUBTOTAL of Receipts This Page (optional).....▶			500.00	
TOTAL This Period (last page this line number only).....▶			500.00	

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER:  
 (check only one)

PAGE 1 OF 2

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

South Carolina Bankers Association Federal PAC

Full Name (Last, First, Middle Initial)

<b>A.</b>				Date of Disbursement	
First Citizens Bank				11 30 2020	
Mailing Address					
PO Box 29					
City		State	Zip Code		
Columbia		SC	29202		
Purpose of Disbursement				FEC Identification Number	
Credit card processing charge				C	
Candidate Name				Amount of Each Disbursement this Period	
				149.12	
Office Sought: House Senate President				Memo Item	
Disbursement For: Primary General Other (specify) ▼					
State:		District:			

Full Name (Last, First, Middle Initial)

<b>B.</b>				Date of Disbursement	
First Citizens Bank				12 01 2020	
Mailing Address					
PO Box 29					
City		State	Zip Code		
Columbia		SC	29202		
Purpose of Disbursement				FEC Identification Number	
Credit card processing charge				C	
Candidate Name				Amount of Each Disbursement this Period	
				124.75	
Office Sought: House Senate President				Memo Item	
Disbursement For: Primary General Other (specify) ▼					
State:		District:			

Full Name (Last, First, Middle Initial)

<b>C.</b>				Date of Disbursement	
First Citizens Bank				12 02 2020	
Mailing Address					
PO Box 29					
City		State	Zip Code		
Columbia		SC	29202		
Purpose of Disbursement				FEC Identification Number	
Credit card processing charges				C	
Candidate Name				Amount of Each Disbursement this Period	
				34.40	
Office Sought: House Senate President				Memo Item	
Disbursement For: Primary General Other (specify) ▼					
State:		District:			

SUBTOTAL of Disbursements This Page (optional)

308.27

TOTAL This Period (last page this line number only)



**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER:  
 (check only one)

PAGE 2 OF 2

<input checked="" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

South Carolina Bankers Association Federal PAC

Full Name (Last, First, Middle Initial)

Date of Disbursement

A.

Harland Clarke

11 30 2020

Mailing Address

15955 La Cantera Parkway

City

State

Zip Code

San Antonio

TX

78256

Purpose of Disbursement

001

FEC Identification Number

C

Check fee

Candidate Name

 Category/  
Type

Amount of Each Disbursement this Period

43 57

Office Sought:

House

Disbursement For:

Senate

Primary

General

President

Other (specify) ▼

State:

District:

Memo Item

Full Name (Last, First, Middle Initial)

Date of Disbursement

B.

Mailing Address

City

State

Zip Code

Purpose of Disbursement

 Category/  
Type

FEC Identification Number

C

Candidate Name

Amount of Each Disbursement this Period

Office Sought:

House

Disbursement For:

Senate

Primary

General

President

Other (specify)

State:

District:

Memo Item

Full Name (Last, First, Middle Initial)

Date of Disbursement

C.

Mailing Address

City

State

Zip Code

Purpose of Disbursement

 Category/  
Type

FEC Identification Number

C

Candidate Name

Amount of Each Disbursement this Period

Office Sought:

House

Disbursement For:

Senate

Primary

General

President

Other (specify) ▼

State:

District:

Memo Item

SUBTOTAL of Disbursements This Page (optional)

43 57

TOTAL This Period (last page this line number only)

351 84

**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER:  
 (check only one)

PAGE 1 OF 1

<input type="checkbox"/> 21b	<input checked="" type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

South Carolina Bankers Association Federal PAC

<b>A.</b> Full Name (Last, First, Middle Initial) <u>American Bankers Association</u> Mailing Address <u>1120 Connecticut Ave NW</u> City <u>Washington</u> State <u>DC</u> Zip Code <u>20036</u> Purpose of Disbursement <u>Fair share contribution</u> Candidate Name _____ Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) ▼ _____ State: _____ District: _____				Date of Disbursement 12 07 2020 FEC Identification Number <b>C</b> Amount of Each Disbursement this Period 1,621 00 Memo Item	
<b>B.</b> Full Name (Last, First, Middle Initial) _____ Mailing Address _____ City _____ State _____ Zip Code _____ Purpose of Disbursement _____ Candidate Name _____ Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) _____ State: _____ District: _____				Date of Disbursement _____ FEC Identification Number <b>C</b> Amount of Each Disbursement this Period _____ Memo Item	
<b>C.</b> Full Name (Last, First, Middle Initial) _____ Mailing Address _____ City _____ State _____ Zip Code _____ Purpose of Disbursement _____ Candidate Name _____ Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify) _____ State: _____ District: _____				Date of Disbursement _____ FEC Identification Number <b>C</b> Amount of Each Disbursement this Period _____ Memo Item	
<b>SUBTOTAL</b> of Disbursements This Page (optional) ..... ▶				1,621 00	
<b>TOTAL</b> This Period (last page this line number only) ..... ▶				1,621 00	



FAQs >

Track Another Package +

Tracking Number: 70063450000344124313

Remove X

Your item was delivered to the front desk, reception area, or mail room at 10:52 am on May 6, 2021 in WASHINGTON, DC 20463.

**Delivered, Front Desk/Reception/Mail Room**

May 6, 2021 at 10:52 am  
WASHINGTON, DC 20463

Feedback

Get Updates v

**Text & Email Updates**



Select what types of updates you'd like to receive and how. Send me a notification for:

**Text**

**Email**

☐☐

All Below Updates

☐☐

Expected Delivery Updates

☐☐

Day of Delivery Updates

☐☐

Package Delivered

☐☐

Available for Pickup ⓘ

☐☐

Delivery Exception Updates ⓘ

☐☐

Package In-Transit Updates ⓘ

Tracking History



**May 6, 2021, 10:52 am**

Delivered, Front Desk/Reception/Mail Room  
WASHINGTON, DC 20463

Your item was delivered to the front desk, reception area, or mail room at 10:52 am on May 6, 2021 in WASHINGTON, DC 20463.

**May 4, 2021, 11:12 am**

Delivery Attempted - No Access to Delivery Location  
WASHINGTON, DC 20463

**May 4, 2021, 9:29 am**

Arrived at Post Office  
WASHINGTON, DC 20018

**May 2, 2021**

In Transit to Next Facility

**April 28, 2021, 10:44 pm**

Arrived at USPS Regional Origin Facility  
COLUMBIA SC PROCESSING CENTER

**April 28, 2021, 5:00 pm**

Departed Post Office  
COLUMBIA, SC 29201

**April 28, 2021, 11:09 am**

USPS in possession of item  
COLUMBIA, SC 29201

Feedback

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**Product Information**



**Postal Product:**  
First-Class Mail®

**Features:**  
Certified Mail™  
Return Receipt

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**See Less** ^

**Can't find what you're looking for?**

Go to our FAQs section to find answers to your tracking questions.

**FAQs**

Feedback



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 22, 2021

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

AF# 4181 – S.C. Bankers Political Action Committee and Donna S. Taylor, in her official capacity as Treasurer<sup>1</sup> (C00103861)

### **Summary of Recommendation**

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$351 civil money penalty.

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

The 2020 Year-End Report was due on January 31, 2021. The respondents filed the report on April 1, 2021, 60 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On April 5, 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 Year-End Report and made a preliminary determination that the civil money penalty was \$704 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was emailed to the respondents’ email address of record from the Reports Analysis Division (“RAD”) on April 20, 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 political committee not authorized by a candidate which is filing on a quarterly basis shall file a report for the final calendar quarter of the year by January 31 of the following calendar year. 52 U.S.C. § 30104(a)(4)(A)(i) and 11 C.F.R. § 104.5(c)(1)(i). Reports sent by first class mail must be received by the close of business on the filing date to be timely filed. If the report is sent by registered or certified mail, by Express or Priority Mail with delivery confirmation or by overnight delivery service with an online tracking system, and scheduled for next business day delivery, it must be postmarked, or deposited with the mailing service, no later than the filing date to be timely filed. 52 U.S.C. § 30104(a)(5), and 11 C.F.R. §§ 100.19 and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

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<sup>1</sup> On 6/15/21, the Committee informed RAD that it mailed an Amended Form 1 (Statement of Organization) to change the Treasurer. Upon receipt and processing by the FEC, the change in Treasurer will be reflected in this matter.

## Summary of Respondents' Challenge

On April 27, 2021, the Commission received the written response (“challenge”) from the Committee requesting the penalty be waived because the 2020 Year-End Report was not timely filed due to unforeseen circumstances. The Committee President/CEO explains that the Committee’s previous Treasurer resigned abruptly on January 6, 2021, and the Committee did not have access to its financial records. The Committee received a notification regarding the late filing on February 17, 2021, and “...hired a CPA firm to assist in reconstructing the financial records so that we could file.” The Committee mailed the report via USPS Certified Mail on April 1, 2021. The Committee did not realize the report had not been received by the FEC until it received the notification of this matter on April 20, 2021.

The President/CEO states that he has assumed the roles and responsibilities of Treasurer and requests assistance with changing the Treasurer of record. He also states that all future filings will be submitted on time based on new processes and procedures.

## Analysis

The Committee indicates the 2020 Year-End Report was not timely filed because the Treasurer abruptly resigned, and the Committee had to reconstruct its financial records in order to file the report. While sympathetic to the Committee’s circumstances, the Reviewing Officer notes that a committee’s treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d). Moreover, unavailability of the Treasurer is specifically included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents’ control. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a).

At the time of the RTB finding, the Commission used an estimated level of activity (\$15,436) to calculate the penalty because the 2020 Year-End Report had not yet been filed. 11 C.F.R. § 111.43(d)(2). On April 1, 2021, the Committee filed the 2020 Year-End Report, 60 days late.<sup>2</sup> The 2020 Year-End Report discloses \$500 in total receipts and \$1,973 in total disbursements during the reporting period. Therefore, the actual level of activity for the 2020 Year-End reporting period is \$2,473. 11 C.F.R. § 111.43(d)(3). Using the schedule of penalties at 11 C.F.R. § 111.43(a), a penalty of \$351 should be assessed.

Therefore, 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 \$351 (reduced from the RTB penalty of \$704).

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<sup>2</sup> In the challenge, respondents note that they first mailed the 2020 Year-End Report on 4/1/21. On 4/20/21, the Committee realized it had not yet been delivered to the FEC. On 4/28/21, the Committee mailed a second copy of the report to the FEC. On 5/13/21, both mailings were received by the FEC. Because the reports were sent by USPS Certified Mail with delivery confirmation, they are considered filed on the postmark date. 52 U.S.C. § 30104(a)(5), and 11 C.F.R. §§ 100.19(b)(1) and 104.5(e). For the purpose of calculating the civil money penalty, the 2020 Year-End Report is considered filed on 4/1/21.

**OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4181 involving S.C. Bankers Political Action Committee and Donna S. Taylor, in her official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4181 that S.C. Bankers Political Action Committee and Donna S. Taylor, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$351 civil money (reduced from the RTB civil money penalty of \$704); and
3. Send the appropriate letter.

**Attachments**

Attachment 1 –

Attachment 2 – Declaration from RAD

Attachment 3 – Declaration from OAR



**DECLARATION OF KRISTIN D. ROSER**

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to S. C. Bankers Political Action Committee:
  - A) Non-Filer Letter, dated February 17, 2021, referencing the 2020 Year-End Report (sent via electronic mail to: dtaylor@scbankers.org);
  - B) Reason-to-Believe Letter, dated April 20, 2021, referencing the 2020 Year-End Report (sent via electronic mail to: dtaylor@scbankers.org).
4. I hereby certify that I have searched the Commission's public records and find that S. C. Bankers Political Action Committee filed the 2020 Year-End Report with the Commission on April 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 22nd day of June, 2021.



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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-7

February 17, 2021

DONNA S TAYLOR, TREASURER  
S. C. BANKERS POLITICAL ACTION COMMITTEE  
PO BOX 1483  
PO BOX 1483  
COLUMBIA, SC 29202

IDENTIFICATION NUMBER: C00103861

REFERENCE: YEAR-END REPORT (11/24/2020 - 12/31/2020)

Dear Treasurer:

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

It is important that you file this report immediately with the Federal Election Commission, 1050 First Street, NE, Washington, DC 20002. Please note, on June 18, 2020, the Federal Election Commission began the initial phase (Phase I) of its return to normal operations. At this stage, the agency's offices will remain closed to visitors and most of its employees will continue to telework in an effort to limit the spread of coronavirus (COVID-19). The Commission is processing some documents submitted by mail, though processing will not occur on a daily basis until the agency resumes normal mail operations. Reports sent by registered mail, overnight delivery, or certified mail, are considered filed with the FEC as of the date of the postmark. Reports submitted by first-class mail will be considered filed when actually received by Commission staff, subject to delays resulting from the agency's limited mail processing. The Commission will not be able to receive, or process reports filed by courier service during Phase I. The FEC does not have statutory authority to extend filing deadlines, but it may choose not to pursue administrative fines against filers prevented from filing by reasonably unforeseen circumstances beyond their control.

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

The failure to timely file this report may result in civil money penalties, suspension of


S. C. BANKERS POLITICAL ACTION COMMITTEE

Page 2 of 2

matching funds payments, 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. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact 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 cursive script that reads "Debbie Chacona".

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 report for the period ending December 31 no later than January 31 of the following calendar year. Reports sent by first class mail must be received by the close of business on the filing date to be timely filed. If the report is sent by registered or certified mail, by Express or Priority Mail with delivery confirmation or by overnight delivery service with an online tracking system, and scheduled for next business day delivery, it must be postmarked, or deposited with the mailing service, no later than the filing date to be timely filed. 52 U.S.C. § 30104(a)(5), and 11 C.F.R. §§ 100.19 and 104.5(e).
- 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 Page, Summary Page, Detailed Summary Pages, and Envelope of the 2020 Year-End Report filed by S.C. Bankers Political Action Committee. The report includes the coverage period of November 24, 2020 through December 31, 2020 and is considered filed April 1, 2021.
  - b) Cover Page, Summary Page, Detailed Summary Pages, and Envelope of the 2020 Year-End Report filed by S.C. Bankers Political Action Committee. The report includes the coverage period of November 24, 2020 through December 31, 2020 and is considered filed April 28, 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 22<sup>nd</sup> day of June, 2021.

*Rhiannon Magruder*

Rhiannon Magruder

Reviewing Officer

Office of Administrative Review

Federal Election Commission

RECEIVED  
FEC MAIL CENTER

2021 MAY 13 AM 8:01

Office Use Only

12FE4M5

29202

ZIP CODE ▲

AMENDED  
(A)

in the  
State of

2020

Date \_\_\_\_\_

Office  
Use  
Only

**FEC FORM 3X**  
Rev. 05/2016

# SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev 05/2016)

Page 2

Write or Type Committee Name

South Carolina Bankers Association Federal PAC

Report Covering the Period

From

11 24 2020

To:

12 31 2020

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 (a) Cash on Hand January 1, 2020		26,161.89
(b) Cash on Hand at Beginning of Reporting Period	34,807.07	
(c) Total Receipts (from Line 19)	500.00	33,238.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	35,307.07	59,399.89
7 Total Disbursements (from Line 31)	1,972.84	26,068.66
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	33,331.23	33,331.23
9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		

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

## For further information contact:

Federal Election Commission  
1050 First Street, N.E.  
Washington, DC 20463

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

# DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev 05/2016)

Page 3

Write or Type Committee Name

South Carolina Bankers Association Federal PAC

Report Covering the Period:

From:

11 24 2020

To:

12 31 2020

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other		
Than Political Committees		
(i) Itemized (use Schedule A).....	500.00	14 590 00
(ii) Unitemized .....		14,648 00
(iii) TOTAL (add		
Lines 11(a)(i) and (ii) .....		29 238 00
(b) Political Party Committees .....		
(c) Other Political Committees		
(such as PACs).....		4 000.00
(d) Total Contributions (add Lines		
11(a)(iii), (b), and (c)) (Carry		
Totals to Line 33, page 5) .....	500.00	33 238.00
12. Transfers From Affiliated/Other		
Party Committees .....		
13. All Loans Received .....		
14. Loan Repayments Received .....		
15. Offsets To Operating Expenditures		
(Refunds, Rebates, etc.)		
(Carry Totals to Line 37, page 5) .....		
16. Refunds of Contributions Made		
to Federal Candidates and Other		
Political Committees .....		
17. Other Federal Receipts		
(Dividends, Interest, etc.) .....		
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account		
(from Schedule H3) .....		
(b) Levin Funds (from Schedule H5) .....		
(c) Total Transfers (add 18(a) and 18(b)) .....		
19. Total Receipts (add Lines 11(d),		
12, 13, 14, 15, 16, 17, and 18(c)) .....	500.00	33 238.00
20. Total Federal Receipts		
(subtract Line 18(c) from Line 19) .....	500.00	33 238 00



# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures.		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	:	:
(ii) Non-Federal Share	:	:
(b) Other Federal Operating Expenditures	351 84	2,318 66
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	351 84	2 318 66
22. Transfers to Affiliated/Other Party Committees	1,621 00	23,750 00
23. Contributions to Federal Candidates/Committees and Other Political Committees		
24. Independent Expenditures (use Schedule E)		
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F)		
26. Loan Repayments Made		
27. Loans Made		
28. Refunds of Contributions To		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))		
29. Other Disbursements (Including Non-Federal Donations)		
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share		
(ii) "Levin" Share		
(b) Federal Election Activity Paid Entirely With Federal Funds		
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))		
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))	1 972 84	26 068 66
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31)	1 972 84	26 068 66



Page 5

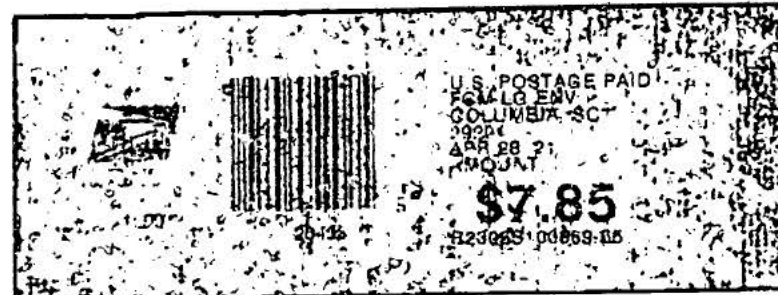
2021-05-18-03-0007050

VELOPE TO THE RIGHT  
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**CERTIFIED MAIL**



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uth Carolina  
nkers Association  
i. Box 1483  
lumbia, SC 29202

Federal Election Commission  
1050 First Street, N.E.  
Washington DC 20463

RECEIVED  
FEDERAL CENTER  
2021 MAY 13 AM 8:01

FEC  
FORM 3XREPORT OF RECEIPTS  
AND DISBURSEMENTS  
For Other Than An Authorized CommitteeRECEIVED  
FEC MAIL CENTER

2021 MAY 13 AM 8:04

1. NAME OF  
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type  
over the lines.

12FE4M5

South Carolina Bankers Association Federal Political Action Committee

ADDRESS (number and street)

PO Box 1483

Check if different  
than previously  
reported. (ACC)

Columbia

SC

29202

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C 00103861

3. IS THIS  
REPORTNEW  
(N)

OR

AMENDED  
(A)

## 4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

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

Feb 20 (M2)



May 20 (M5)



Aug 20 (M8)

Nov 20 (M11)  
(Non-Election  
Year Only)

Mar 20 (M3)



Jun 20 (M6)



Sep 20 (M9)

Dec 20 (M12)  
(Non-Election  
Year Only)

Apr 20 (M4)



Jul 20 (M7)



Oct 20 (M10)



Jan 31 (YE)

(c) 12-Day  
PRE-Election  
Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

in the  
State of

MM / DD / YYYY

(d) 30-Day  
POST-Election  
Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

in the  
State of

MM / DD / YYYY

5. Covering Period

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

through

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

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

FRANK L. GROWN, III

Signature of Treasurer

Date

MM / DD / YYYY

MM / DD / YYYY

MM / DD / YYYY

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

Office  
Use  
OnlyFEC FORM 3X  
Rev. 05/2016

# SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

South Carolina Bankers Association Federal PAC

Report Covering the Period:

From:

 M M M / D D D / Y Y Y Y Y Y  
 11 / 24 / 2020

To:

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

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6 (a) Cash on Hand January 1, <span>2020</span>		26,161.89
(b) Cash on Hand at Beginning of Reporting Period.....	34,807.07	
(c) Total Receipts (from Line 19) .....	500.00	33,238.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	35,307.07	59,399.89
7. Total Disbursements (from Line 31).....	1,972.84	26,068.66
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	33,331.23	33,331.23
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) .....		
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) .....		



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

## For further information contact:

 Federal Election Commission  
 1050 First Street, N.E.  
 Washington, DC 20463

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

2021105180300078010



# **DETAILED SUMMARY PAGE** of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

South Carolina Bankers Association Federal PAC

Report Covering the Period:

From:

MM	DD	YY
11	24	2020

To:

MM	DD	YY
12	31	2020

**I. Receipts**

**COLUMN A**  
Total This Period

**COLUMN B**  
Calendar Year-to-Date

## 11. Contributions (other than loans) From:

## (a) Individuals/Persons Other

Than Political Committees

## (i) Itemized (use Schedule A)

500.00

14,590.00

## (ii) Unitemized

14,648.00

## (iii) TOTAL (add

Lines 11(a)(i) and (ii) ▶

29,238.00

## (b) Political Party Committees

## (c) Other Political Committees

(such as PACs)

4,000.00

## (d) Total Contributions (add Lines

11(a)(iii), (b), and (c)) (Carry

Totals to Line 33, page 5) ▶

500.00

33,238.00

## 12. Transfers From Affiliated/Other

Party Committees

## 13. All Loans Received

## 14. Loan Repayments Received

## 15. Offsets To Operating Expenditures

(Refunds, Rebates, etc.)

(Carry Totals to Line 37, page 5)

## 16. Refunds of Contributions Made

to Federal Candidates and Other

Political Committees

## 17. Other Federal Receipts

(Dividends, Interest, etc.)

## 18. Transfers from Non-Federal and Levin Funds

## (a) Non-Federal Account

(from Schedule H3)

## (b) Levin Funds (from Schedule H5)

## (c) Total Transfers (add 18(a) and 18(b))

## 19. Total Receipts (add Lines 11(d),

12, 13, 14, 15, 16, 17, and 18(c)) ▶

500.00

33,238.00

## 20. Total Federal Receipts

(subtract Line 18(c) from Line 19) ▶

500.00

33,238.00

2021-05-18 PM 00:00:00

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21	Operating Expenditures:		
(a)	Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i)	Federal Share .....		
(ii)	Non-Federal Share .....		
(b)	Other Federal Operating Expenditures .....	351.84	2,318.66
(c)	Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b)) .....	351.84	2,318.66
22	Transfers to Affiliated/Other Party Committees .....	1,621.00	23,750.00
23	Contributions to Federal Candidates/Committees and Other Political Committees .....		
24	Independent Expenditures (use Schedule E) .....		
25	Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F) .....		
26	Loan Repayments Made .....		
27	Loans Made .....		
28	Refunds of Contributions To:		
(a)	Individuals/Persons Other Than Political Committees .....		
(b)	Political Party Committees .....		
(c)	Other Political Committees (such as PACs) .....		
(d)	Total Contribution Refunds (add Lines 28(a), (b), and (c)) .....		
29	Other Disbursements (Including Non-Federal Donations) .....		
30	Federal Election Activity (52 U.S.C. § 30101(20))		
(a)	Allocated Federal Election Activity (from Schedule H6)		
(i)	Federal Share .....		
(ii)	"Levin" Share .....		
(b)	Federal Election Activity Paid Entirely With Federal Funds .....		
(c)	Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b)) .....		
31	Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	1,972.84	26,068.66
32	Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31) .....	1,972.84	26,068.66

# **DETAILED SUMMARY PAGE** of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33 Total Contributions (other than loans) (from Line 11(d), page 3) .....		
34 Total Contribution Refunds (from Line 28(d)) .....		
35 Net Contributions (other than loans) (subtract Line 34 from Line 33) .....		
36 Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b)) .....	351.84	2,318.66
37 Offsets to Operating Expenditures (from Line 15, page 3) .....		
38 Net Operating Expenditures (subtract Line 37 from Line 36) .....	351.84	2,318.66

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South Carolina  
Bankers Association

P.O. Box 1483  
Columbia, SC 29202



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R2303S100722-11

Federal Election Commission  
1050 First Street, N.E.  
Washington, DC 20563

20463

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2021 MAY 13 AM 8:04





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

June 24, 2021

Donna S. Taylor, in official capacity as Treasurer  
S.C. Bankers Political Action Committee  
PO Box 1483  
Columbia, SC 29202

C00103861  
AF# 4181

Dear Ms. Taylor:

On April 5, 2021, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that S.C. Bankers Political Action Committee and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2020 Year-End Report. The Commission also made a preliminary determination that the civil money penalty was \$704 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 reduced 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,

*Rhiannon Magruder*

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review

**RECEIVED**

By Office of the Commission Secretary at 12:32 pm, Jul 20, 2021



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

July 20, 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# 4181 – S.C. Bankers Political Action Committee and Fred L. Green III, in his official capacity as Treasurer<sup>1</sup> (C00103861)

On April 5, 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 Year-End Report and made a preliminary determination that the civil money penalty was \$704 based on the schedule of penalties at 11 C.F.R. § 111.43. On April 27, 2021, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated June 22, 2021 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$351 civil money penalty (reduced from the RTB civil money penalty of \$704).

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). The respondents have since paid the recommended civil money penalty of \$351.

<sup>1</sup> On 6/24/21, the Committee filed an Amended Form 1 (Statement of Organization) to change the Treasurer to Fred L. Green III. The respondents in this matter have been updated accordingly.  
<https://docquery.fec.gov/pdf/395/202106280300379395/202106280300379395.pdf>

**OAR Recommendations**

1. Adopt the Reviewing Officer recommendation for AF# 4181 involving S.C. Bankers Political Action Committee and Fred L. Green III, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 4181 that S.C. Bankers Political Action Committee and Fred L. Green III, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$351 civil money (reduced from the RTB civil money penalty of \$704); and
3. Send the appropriate letter.

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) AF 4181  
 Final Determination Recommendation: )  
 S.C. Bankers Political Action Committee )  
 and Fred L. Green III, in his official )  
 capacity as Treasurer (C00103861) )

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 28, 2021, the Commission decided by a vote of 6-0 to take the following actions in AF 4181:

1. Adopt the Reviewing Officer recommendation for AF# 4181 involving S.C. Bankers Political Action Committee and Fred L. Green III, in their official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 4181 that S.C. Bankers Political Action Committee and Fred L. Green III, in their official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$351 civil money penalty (reduced from the RTB civil money penalty of \$704).
3. Send the appropriate letter.

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



Attest:

**Laura  
Sinram**

Laura E. Sinram  
 Acting Secretary and Clerk of the  
 Commission

Digitally signed by  
 Laura Sinram  
 Date: 2021.08.04  
 14:38:08 -04'00'



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

August 11, 2021

Fred L. Green III, in official capacity as Treasurer  
S.C. Bankers Political Action Committee  
P.O. Box 1483  
Columbia, SC 29202

C00103861  
AF# 4181

Dear Mr. Green:

On April 5, 2021, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that S.C. Bankers Political Action Committee and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2020 Year-End Report. By letter dated April 20, 2021, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$704 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On April 27, 2021, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission reduce the RTB civil money penalty because it was calculated using an estimated level of activity, make a final determination that S.C. Bankers Political Action Committee and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the actual level of activity disclosed on the 2020 Year-End Report filed April 1, 2021 (\$2,473), assess a civil money penalty in the amount of \$351 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on June 24, 2021.

On July 28, 2021, the Commission adopted the Reviewing Officer's recommendation and made a final determination that S.C. Bankers Political Action Committee and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and based on the level of activity disclosed on the 2020 Year-End Report (\$2,473), assessed a civil money penalty in the amount of \$351 (reduced from the RTB civil money penalty of \$704). It is based on the same factors used to calculate the civil money penalty at RTB except that the actual rather than the estimated level of activity was used. A copy of the Final Determination Recommendation is attached.

On July 27, 2021, the Commission received your \$351 payment.

**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.

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