

**RECEIVED***By Office of the Commission Secretary at 12:35 pm, Feb 21, 2023*

**FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463**

**SENSITIVE**

February 21, 2023

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

SUBJECT: Reason To Believe Recommendation – 2022 12-Day Pre-General Report  
(Unauthorized Committees – Quarterly Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2022 12-Day Pre-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2022 through October 19, 2022, and failed to file or timely file the 2022 12-Day Pre-General Report.

The committees listed on the attached RTB Circulation Report failed to file the report prior to four (4) days before the General Election (considered a non-filed report). In accordance with the schedule of civil money penalties at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

As noted above, the 2022 12-Day Pre-General Report circulation list includes unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2022 through October 19, 2022, but failed to file or timely file the 2022 12-Day Pre-General Election

Report. In order to accurately identify these committees for administrative fine purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12-Day Pre-General Report (12G) submitted by an unauthorized quarterly filer was reviewed to ensure that it disclosed General Election contributions or expenditures made during the coverage dates of the report. Any report meeting this definition that was filed late is included in the list. Any report not disclosing general election contributions or expenditures during this period is not included in the list, as it is not a required filing.
- Every 30-Day Post-General Report (30G) submitted by an unauthorized quarterly filer that covered the period from October 1, 2022 through November 28, 2022 (59 days) was reviewed for activity which would have required the filing of a 12G. If our research indicated that a 12G was required, we utilized a three-step method to arrive at the activity on which to base the 12G 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 this activity was calculated by multiplying the total amount of unitemized activity on the report by  $32.20\% (19 \text{ days (12G Filing Period)}/59 \text{ days (30G Filing Period)})$ . Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 12G.
- Every Year-End Report (YE) submitted by an unauthorized quarterly filer that covered the period from October 1, 2022 through December 31, 2022 (92 days) was reviewed for activity which would have required the filing of a 12G. If our research indicated that a 12G was required, we utilized a three-step method to arrive at the activity on which to base the 12G 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 this activity was calculated by multiplying the total amount of unitemized activity on the report by  $20.65\% (19 \text{ days (12G Filing Period)}/92 \text{ days (YE Filing Period)})$ . Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 12G.

## **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**  
**2022 PRE-GENERAL Election Sensitive 10/27/2022 UNAUTH\_Q**

| AF#  | Committee ID | Committee Name   | Candidate Name | Treasurer                 | Threshold | PV | Receipt Date | Days Late | LOA      | RTB Penalty |
|------|--------------|--|----------------|---------------------------|-----------|----|--------------|-----------|----------|-------------|
| 4511 | C00426445    | ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC)                                       |                | MICHAEL DUBE              | \$197,949 | 0  | 12/30/2022   | Not Filed | \$11,500 | \$1,450     |
| 4512 | C00636753    | ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE                                 |                | MICHAEL CHARLES GILLILAND | \$315,275 | 0  | 1/27/2023    | Not Filed | \$33,500 | \$2,255     |
| 4513 | C00413955    | AMERICAN ASSOCIATION OF NEUROLOGICAL SURGEONS POLITICAL ACTION COMMITTEE (NEUROSURGERYPAC) |                | SEPIDEH AMIN-HANJANI      | \$886,753 | 0  | 1/31/2023    | Not Filed | \$22,828 | \$1,450     |
| 4514 | C00438358    | AMSTED INDUSTRIES INCORPORATED PAC   |                | TRISTAN PAIGE LOPEZ       | \$152,730 | 3  | 1/19/2023    | Not Filed | \$14,500 | \$2,537     |
| 4515 | C00528349    | CLARK PAC  |                | GEORGE PARKER CLARK       | \$135,955 | 0  | 1/31/2023    | Not Filed | \$21,800 | \$1,450     |
| 4516 | C00453704    | EMGAGE FEDERAL POLITICAL ACTION COMMITTEE  |                | AMIN MITHA                | \$127,320 | 0  | 12/13/2022   | Not Filed | \$538    | \$538       |
| 4517 | C00141382    | GANNETT FLEMING, INC PAC   |                | JON H. KESSLER            | \$193,028 | 0  | 12/6/2022    | Not Filed | \$4,987  | \$806       |
| 4518 | C00292094    | GENESIS HEALTHCARE INC PAC   |                | MICHAEL SHERMAN           | \$244,856 | 0  | 12/9/2022    | Not Filed | \$5,000  | \$966       |
| 4519 | C00756205    | HINDUS OF GEORGIA PAC  |                | SURESH KRISHNAMOORTHY     | \$170,118 | 0  | 1/2/2023     | Not Filed | \$29,502 | \$2,255     |
| 4520 | C00771832    | LAKEVILLE ROAD POLITICAL ACTION COMMITTEE  |                | ROBERT M. WERNER          | \$145,565 | 0  | 1/13/2023    | Not Filed | \$2,023  | \$806       |
| 4521 | C00521310    | LIBERTY FUND; THE  |                | PAMELA PEIPER             | \$324,544 | 0  | 12/7/2022    | Not Filed | \$9,055  | \$966       |
| 4522 | C00690776    | MICHIGAN LIBERATION ACTION FUND  |                | RAIADA LANIER             | \$166,532 | 0  | 12/19/2022   | Not Filed | \$56,838 | \$5,137     |

| AF#  | Committee ID | Committee Name  | Candidate Name | Treasurer                 | Threshold | PV | Receipt Date | Days Late | LOA      | RTB Penalty |
|------|--------------|---|----------------|---------------------------|-----------|----|--------------|-----------|----------|-------------|
| 4523 | C00150045    | NORTH ATLANTIC STATES REGIONAL COUNCIL OF CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE, UNITED BROTHERHOOD OF CARPENTERS & JOINERS OF AMERICA |                | STEPHEN JOYCE             | \$194,733 | 0  | 12/15/2022   | Not Filed | \$15,000 | \$1,450     |
| 4524 | C00216754    | NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC   |                | PHILLIP JACOB PARKER, JR. | \$170,570 | 0  | 12/7/2022    | Not Filed | \$2,500  | \$806       |
| 4525 | C00238204    | PAKISTANI AMERICAN PUBLIC AFFAIRS COMMITTEE PAK-PAC   |                | UZMA A. ALI               | \$397,845 | 0  | 12/9/2022    | Not Filed | \$11,836 | \$1,450     |

\*All of the committees on this list failed to file a report covering the 12-Day Pre-General Reporting period prior to four (4) days before the general election; therefore, per 11 C.F.R. 111.43(e), the reports are considered to be not filed.

## BEFORE THE FEDERAL ELECTION COMMISSION

|   |            |
|---|------------|
| In the Matter of                        | )          |
|   | )          |
| Reason To Believe Recommendation - 2022 | )          |
| 12-Day Pre-General Report (Unauthorized | )          |
| Committees – Quarterly Filers) for the  | )          |
| Administrative Fine Program:            | )          |
| ABIOMED INC POLITICAL ACTION            | ) AF# 4511 |
| COMMITTEE (ABIOMED PAC), and            | )          |
| DUBE, MICHAEL as treasurer;             | )          |
| ACADEMY OF RAIL LABOR                   | ) AF# 4512 |
| ATTORNEYS POLITICAL ACTION              | )          |
| COMMITTEE, and GILLILAND,               | )          |
| MICHAEL CHARLES as treasurer;           | )          |
| AMERICAN ASSOCIATION OF                 | ) AF# 4513 |
| NEUROLOGICAL SURGEONS                   | )          |
| POLITICAL ACTION COMMITTEE              | )          |
| (NEUROSURGERYPAC), and AMIN-            | )          |
| HANJANI, SEPIDEH DR. as treasurer;      | )          |
| AMSTED INDUSTRIES                       | ) AF# 4514 |
| INCORPORATED PAC, and LOPEZ,            | )          |
| TRISTAN PAIGE as treasurer;             | )          |
| CLARK PAC, and GEORGE PARKER            | ) AF# 4515 |
| CLARK as treasurer;                     | )          |
| EMGAGE FEDERAL POLITICAL                | ) AF# 4516 |
| ACTION COMMITTEE, and MITHA,            | )          |
| AMIN as treasurer;                      | )          |
| GANNETT FLEMING, INC PAC, and           | ) AF# 4517 |
| KESSLER, JON H as treasurer;            | )          |
| GENESIS HEALTHCARE INC PAC, and         | ) AF# 4518 |
| SHERMAN, MICHAEL as treasurer;          | )          |
| HINDUS OF GEORGIA PAC, and              | ) AF# 4519 |
| KRISHNAMOORTHY, SURESH as               | )          |
| treasurer;                              | )          |
| LAKEVILLE ROAD POLITICAL                | ) AF# 4520 |
| ACTION COMMITTEE, and WERNER,           | )          |
| ROBERT M as treasurer;                  | )          |
| LIBERTY FUND; THE, and PAMELA           | ) AF# 4521 |
| PEIPER as treasurer;                    | )          |
| MICHIGAN LIBERATION ACTION              | ) AF# 4522 |
| FUND, and LANIER, RAIADA as             | )          |
| treasurer;                              | )          |

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|                                  |            |
|----------------------------------|------------|
| NORTH ATLANTIC STATES            | ) AF# 4523 |
| REGIONAL COUNCIL OF              | )          |
| CARPENTERS LEGISLATIVE           | )          |
| IMPROVEMENT COMMITTEE, UNITED    | )          |
| BROTHERHOOD OF CARPENTERS &      | )          |
| JOINERS OF AMERICA, and JOYCE,   | )          |
| STEPHEN as treasurer;            | )          |
| NORTH CAROLINA FARM BUREAU       | ) AF# 4524 |
| FEDERATION INC POL ACT CMTE INC  | )          |
| (AKA) NC FARM BUREAU FARMPAC,    | )          |
| and PARKER, PHILLIP JACOB JR. as | )          |
| treasurer;                       | )          |
| PAKISTANI AMERICAN PUBLIC        | ) AF# 4525 |
| AFFAIRS COMMITTEE PAK-PAC, and   | )          |
| ALI, UZMA A as treasurer;        | )          |

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on February 23, 2023 the Commission took the following actions on the Reason To Believe Recommendation - 2022 12-Day Pre-General Report (Unauthorized Committees – Quarterly Filers) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated February 21, 2023, on the following committees:

AF#4511 Decided by a vote of 5-0 to: (1) find reason to believe that ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC), and DUBE, MICHAEL in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4512 Decided by a vote of 5-0 to: (1) find reason to believe that ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE, and GILLILAND, MICHAEL CHARLES in their official capacity as treasurer, violated 52

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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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4513 Decided by a vote of 5-0 to: (1) find reason to believe that AMERICAN ASSOCIATION OF NEUROLOGICAL SURGEONS POLITICAL ACTION COMMITTEE (NEUROSURGERYPAC), and AMIN-HANJANI, SEPIDEH DR. in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4514 Decided by a vote of 5-0 to: (1) find reason to believe that AMSTED INDUSTRIES INCORPORATED PAC, and LOPEZ, TRISTAN PAIGE in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4515 Decided by a vote of 5-0 to: (1) find reason to believe that CLARK PAC, and GEORGE PARKER CLARK in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4516 Decided by a vote of 5-0 to: (1) find reason to believe that EMGAGE FEDERAL POLITICAL ACTION COMMITTEE, and MITHA, AMIN in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4517 Decided by a vote of 5-0 to: (1) find reason to believe that GANNETT FLEMING, INC PAC, and KESSLER, JON H in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

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AF#4518 Decided by a vote of 5-0 to: (1) find reason to believe that GENESIS HEALTHCARE INC PAC, and SHERMAN, MICHAEL in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4519 Decided by a vote of 5-0 to: (1) find reason to believe that HINDUS OF GEORGIA PAC, and KRISHNAMOORTHY, SURESH in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4520 Decided by a vote of 5-0 to: (1) find reason to believe that LAKEVILLE ROAD POLITICAL ACTION COMMITTEE, and WERNER, ROBERT M in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4521 Decided by a vote of 5-0 to: (1) find reason to believe that LIBERTY FUND; THE, and PAMELA PEIPER in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4522 Decided by a vote of 5-0 to: (1) find reason to believe that MICHIGAN LIBERATION ACTION FUND, and LANIER, RAIADA in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4523 Decided by a vote of 5-0 to: (1) find reason to believe that NORTH ATLANTIC STATES REGIONAL COUNCIL OF CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE, UNITED BROTHERHOOD OF CARPENTERS & JOINERS OF AMERICA, and JOYCE, STEPHEN in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

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AF#4524 Decided by a vote of 5-0 to: (1) find reason to believe that NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC, and PARKER, PHILLIP JACOB JR. in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.

AF#4525 Decided by a vote of 5-0 to: (1) find reason to believe that PAKISTANI AMERICAN PUBLIC AFFAIRS COMMITTEE PAK-PAC, and ALI, UZMA A in their 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, Lindenbaum, and Weintraub voted affirmatively for the decision. Commissioner Trainor did not vote.



Attest:

 Digitally signed by Vicktoria J  
Allen  
Date: 2023.02.24 10:27:46 -05'00'

Vicktoria J. Allen  
Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

February 24, 2023

Michael Charles Gilliland, in official capacity as Treasurer  
 Academy of Rail Labor Attorneys Political Action Committee  
 603 Jonna Street  
 Crozet, VA 22932-9326

C00636753

AF#: 4512  
 FINE: \$2,255

Dear Michael Charles Gilliland,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12-Day Pre-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report is required if your committee makes a contribution to or expenditure on behalf of a candidate in the general election. This report, covering the period October 1, 2022 through October 19, 2022, shall be filed no later than October 27, 2022. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission (the "Commission" or "FEC") indicate that you did not file this report prior to four (4) days before the General Election held on November 8, 2022, the report is considered not filed for the purpose of calculating the civil money penalty.

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 February 23, 2023, the Commission found that there is reason to believe ("RTB") that Academy of Rail Labor Attorneys 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 October 27, 2022. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$2,255. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 1. The FEC's website contains further information about how the administrative fine program works and how the fines are calculated. See <https://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. Your payment of \$2,255 is due within forty (40) days of the finding, or by April 4, 2023, and is based on these factors:

Election Sensitivity of Report: Election Sensitive  
 Level of Activity: \$33,500

## ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE

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Number of Days Late: Not Filed (reports not filed prior to four (4) days before the General Election held on November 8, 2022 are considered not filed for the purpose of calculating the penalty)

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 decide to challenge the RTB finding and/or calculated civil money penalty, you must email a written response to the FEC's Office of Administrative Review at [administrativefines@fec.gov](mailto:administrativefines@fec.gov). 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 4, 2023. 11 C.F.R. § 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 C.F.R. § 111.36(c).

The FEC will only consider challenges that are based on at least one of three factors: (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 C.F.R. § 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 C.F.R. § 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 C.F.R. § 111.35(d).

If you fail to timely raise a factual argument in your challenge to the RTB finding, your right to present such an argument in an appeal to the U.S. District Court under 52 U.S.C. § 30109 shall be deemed waived. 11 C.F.R. § 111.38

## ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE

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It should also be noted that all challenges to an RTB finding and/or calculated civil money penalty should be converted to PDF (Portable Document Format) and 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.

In addition, 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 challenging the RTB finding and/or calculated civil money penalty, the FEC will conclude that the factual allegations underlying the RTB finding and/or calculated civil money penalty are true and make a final determination that Academy of Rail Labor Attorneys 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 Commission 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 C.F.R. § 111.51(a)(2).

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

If you decide to pay the calculated civil money penalty, please follow the payment instructions below. Upon receipt of your payment, the FEC will send you a final determination letter.

You may remit payment by Automated Clearinghouse ("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 <https://www.fec.gov/af/pay.shtml> to be directed to Pay.gov's Administrative Fine Program Payment form. Please use the details at the top of this letter to complete the required fields.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

## ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE

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**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.

**Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission will be rejected. This includes 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. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

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



Dara Lindenbaum  
Chair

ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE

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By Office of the Commission Secretary at 10:54 am, Jul 19, 2023



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

**SENSITIVE**

July 19, 2023

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

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the 2022 12-Day Pre-General Report (Unauthorized Committees – Quarterly 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 2022 12-Day Pre-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

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

For your information, one (1) committee disclosed a change in treasurer after the RTB finding. An overview of this case has been provided below.

Pakistani American Public Affairs Committee PAK-PAC (AF 4525) filed an Amended Statement of Organization after the RTB finding designating Saba Shabnam 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) Send the appropriate letters.

**Federal Election Commission**  
**FD Circulation Report Fine Paid**  
**2022 PRE-GENERAL Election Sensitive 10/27/2022 UNAUTH\_Q**

| 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 |
|------|---|----------------|--------------|---------------------------|--------------|-----------|----------|----|------------|-------------|---------------------|------------|-------------|
| 4511 | ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC)  |                | C00426445    | MICHAEL DUBE              | 12/30/2022   | Not Filed | \$11,500 | 0  | 02/23/2023 | \$1,450     | \$1,450             | 03/09/2023 | \$1,450     |
| 4512 | ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE  |                | C00636753    | MICHAEL CHARLES GILLILAND | 01/27/2023   | Not Filed | \$33,500 | 0  | 02/23/2023 | \$2,255     | \$2,255             | 03/27/2023 | \$2,255     |
| 4514 | AMSTED INDUSTRIES INCORPORATED PAC  |                | C00438358    | TRISTAN PAIGE LOPEZ       | 01/19/2023   | Not Filed | \$14,500 | 3  | 02/23/2023 | \$2,537     | \$2,537             | 02/25/2023 | \$2,537     |
| 4515 | CLARK PAC   |                | C00528349    | GEORGE PARKER CLARK       | 01/31/2023   | Not Filed | \$21,800 | 0  | 02/23/2023 | \$1,450     | \$1,450             | 04/03/2023 | \$1,450     |
| 4517 | GANNETT FLEMING, INC PAC  |                | C00141382    | JON H. KESSLER            | 12/06/2022   | Not Filed | \$4,913  | 0  | 02/23/2023 | \$806       | \$806               | 03/07/2023 | \$806       |
| 4518 | GENESIS HEALTHCARE INC PAC  |                | C00292094    | MICHAEL SHERMAN           | 12/09/2022   | Not Filed | \$5,000  | 0  | 02/23/2023 | \$966       | \$966               | 03/14/2023 | \$966       |
| 4520 | LAKEVILLE ROAD POLITICAL ACTION COMMITTEE   |                | C00771832    | ROBERT M. WERNER          | 01/13/2023   | Not Filed | \$2,037  | 0  | 02/23/2023 | \$806       | \$806               | 03/03/2023 | \$806       |
| 4521 | LIBERTY FUND; THE   |                | C00521310    | PAMELA PEIPER             | 12/07/2022   | Not Filed | \$9,055  | 0  | 02/23/2023 | \$966       | \$966               | 03/09/2023 | \$966       |
| 4522 | MICHIGAN LIBERATION ACTION FUND   |                | C00690776    | RAIADA LANIER             | 12/19/2022   | Not Filed | \$56,838 | 0  | 02/23/2023 | \$5,137     | \$5,137             | 03/22/2023 | \$5,137     |
| 4523 | NORTH ATLANTIC STATES REGIONAL COUNCIL OF CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE, UNITED BROTHERHOOD OF CARPENTERS & JOINERS OF AMERICA |                | C00150045    | STEPHEN JOYCE             | 12/15/2022   | Not Filed | \$15,000 | 0  | 02/23/2023 | \$1,450     | \$1,450             | 02/27/2023 | \$1,450     |
| 4524 | NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC   |                | C00216754    | PHILLIP JACOB PARKER, JR. | 12/07/2022   | Not Filed | \$2,500  | 0  | 02/23/2023 | \$806       | \$806               | 04/10/2023 | \$806       |
| 4525 | PAKISTANI AMERICAN PUBLIC AFFAIRS COMMITTEE PAK-PAC   |                | C00238204    | SABA SHABNAM              | 12/09/2022   | Not Filed | \$11,907 | 0  | 02/23/2023 | \$1,450     | \$1,450             | 07/18/2023 | \$1,450     |

\*All of the committees on this list failed to file a report covering the 12-Day Pre-General reporting period prior to four (4) days before the general election; therefore, per 11 C.F.R. 111.43(e), the reports are considered to be not filed.

**Federal Election Commission**  
**FD Circulation Report Fine Not Paid**  
**2022 PRE-GENERAL Election Sensitive 10/27/2022 UNAUTH\_Q**

| AF#  | Committee Name   | Candidate Name | Committee ID | Treasurer             | Receipt Date | Days Late | LOA      | PV | RTB Date   | RTB Penalty | Days Since RTB | FD Penalty |
|------|--|----------------|--------------|-----------------------|--------------|-----------|----------|----|------------|-------------|----------------|------------|
| 4513 | AMERICAN ASSOCIATION OF NEUROLOGICAL SURGEONS POLITICAL ACTION COMMITTEE (NEUROSURGERYPAC) |                | C00413955    | SEPIDEH AMIN-HANJANI  | 01/31/2023   | Not Filed | \$22,828 | 0  | 02/23/2023 | \$1,450     | 146            | \$1,450    |
| 4516 | EMGAGE FEDERAL POLITICAL ACTION COMMITTEE  |                | C00453704    | AMIN MITHA            | 12/13/2022   | Not Filed | \$538    | 0  | 02/23/2023 | \$538       | 146            | \$538      |
| 4519 | HINDUS OF GEORGIA PAC  |                | C00756205    | SURESH KRISHNAMOORTHY | 01/02/2023   | Not Filed | \$29,502 | 0  | 02/23/2023 | \$2,255     | 146            | \$2,255    |

\*All of the committees on this list failed to file a report covering the 12-Day Pre-General reporting period prior to four (4) days before the general election; therefore, per 11 C.F.R. 111.43(e), the reports are considered to be not filed.

## BEFORE THE FEDERAL ELECTION COMMISSION

|                                      |            |
|--------------------------------------|------------|
| In the Matter of                     | )          |
|                                      | )          |
| Administrative Fine Program – Final  | )          |
| Determination Recommendation for the | )          |
| 2022 12-Day Pre-General Report       | )          |
| (Unauthorized Committees – Quarterly | )          |
| Filers):                             | )          |
| ABIOMED INC POLITICAL ACTION         | ) AF# 4511 |
| COMMITTEE (ABIOMED PAC), and         | )          |
| DUBE, MICHAEL as treasurer;          | )          |
| ACADEMY OF RAIL LABOR                | ) AF# 4512 |
| ATTORNEYS POLITICAL ACTION           | )          |
| COMMITTEE, and GILLILAND,            | )          |
| MICHAEL CHARLES as treasurer;        | )          |
| AMERICAN ASSOCIATION OF              | ) AF# 4513 |
| NEUROLOGICAL SURGEONS                | )          |
| POLITICAL ACTION COMMITTEE           | )          |
| (NEUROSURGERYPAC), and AMIN-         | )          |
| HANJANI, SEPIDEH as treasurer;       | )          |
| AMSTED INDUSTRIES                    | ) AF# 4514 |
| INCORPORATED PAC, and LOPEZ,         | )          |
| TRISTAN PAIGE as treasurer;          | )          |
| CLARK PAC, and GEORGE PARKER         | ) AF# 4515 |
| CLARK as treasurer;                  | )          |
| EMGAGE FEDERAL POLITICAL             | ) AF# 4516 |
| ACTION COMMITTEE, and MITHA,         | )          |
| AMIN as treasurer;                   | )          |
| GANNETT FLEMING, INC PAC, and        | ) AF# 4517 |
| KESSLER, JON H as treasurer;         | )          |
| GENESIS HEALTHCARE INC PAC, and      | ) AF# 4518 |
| SHERMAN, MICHAEL as treasurer;       | )          |
| HINDUS OF GEORGIA PAC, and           | ) AF# 4519 |
| KRISHNAMOORTHY, SURESH as            | )          |
| treasurer;                           | )          |
| LAKEVILLE ROAD POLITICAL             | ) AF# 4520 |
| ACTION COMMITTEE, and WERNER,        | )          |
| ROBERT M as treasurer;               | )          |
| LIBERTY FUND; THE, and PAMELA        | AF# 4521   |
| PEIPER as treasurer;                 |            |
| MICHIGAN LIBERATION ACTION           | ) AF# 4522 |
| FUND, and LANIER, RAIADA as          | )          |
| treasurer;                           | )          |

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|                                  |            |
|----------------------------------|------------|
| NORTH ATLANTIC STATES            | ) AF# 4523 |
| REGIONAL COUNCIL OF              | )          |
| CARPENTERS LEGISLATIVE           | )          |
| IMPROVEMENT COMMITTEE, UNITED    | )          |
| BROTHERHOOD OF CARPENTERS &      | )          |
| JOINERS OF AMERICA, and JOYCE,   | )          |
| STEPHEN as treasurer;            | )          |
| NORTH CAROLINA FARM BUREAU       | ) AF# 4524 |
| FEDERATION INC POL ACT CMTE INC  | )          |
| (AKA) NC FARM BUREAU FARMPAC,    | )          |
| and PARKER, PHILLIP JACOB JR. as | )          |
| treasurer;                       | )          |
| PAKISTANI AMERICAN PUBLIC        | ) AF# 4525 |
| AFFAIRS COMMITTEE PAK-PAC, and   | )          |
| SHABNAM, SABA as treasurer;      | )          |

CERTIFICATION

I, Laura E. Sinram, Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 21, 2023 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2022 12-Day Pre-General Report (Unauthorized Committees – Quarterly Filers), as recommended in the Reports Analysis Division's Memorandum dated July 19, 2023, on the following committees:

AF#4511 Decided by a vote of 4-0 to: (1) make a final determination that ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC), and DUBE, MICHAEL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4512 Decided by a vote of 4-0 to: (1) make a final determination that ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE, and GILLILAND, MICHAEL CHARLES 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

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July 21, 2023

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appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4513 Decided by a vote of 4-0 to: (1) make a final determination that AMERICAN ASSOCIATION OF NEUROLOGICAL SURGEONS POLITICAL ACTION COMMITTEE (NEUROSURGERYPAC), and AMIN-HANJANI, SEPIDEH in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4514 Decided by a vote of 4-0 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, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4515 Decided by a vote of 4-0 to: (1) make a final determination that CLARK PAC, and GEORGE PARKER CLARK in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4516 Decided by a vote of 4-0 to: (1) make a final determination that EMGAGE FEDERAL POLITICAL ACTION COMMITTEE, and MITHA, AMIN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4517 Decided by a vote of 4-0 to: (1) make a final determination that GANNETT FLEMING, INC PAC, and KESSLER, JON H in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4518 Decided by a vote of 4-0 to: (1) make a final determination that GENESIS HEALTHCARE INC PAC, and SHERMAN, MICHAEL in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

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AF#4519 Decided by a vote of 4-0 to: (1) make a final determination that HINDUS OF GEORGIA PAC, and KRISHNAMOORTHY, SURESH in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4520 Decided by a vote of 4-0 to: (1) make a final determination that LAKEVILLE ROAD POLITICAL ACTION COMMITTEE, and WERNER, ROBERT M in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4521 Decided by a vote of 4-0 to: (1) make a final determination that LIBERTY FUND; THE, and PAMELA PEIPER in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4522 Decided by a vote of 4-0 to: (1) make a final determination that MICHIGAN LIBERATION ACTION FUND, and LANIER, RAIADA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4523 Decided by a vote of 4-0 to: (1) make a final determination that NORTH ATLANTIC STATES REGIONAL COUNCIL OF CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE, UNITED BROTHERHOOD OF CARPENTERS & JOINERS OF AMERICA, and JOYCE, STEPHEN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

AF#4524 Decided by a vote of 4-0 to: (1) make a final determination that NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC, and PARKER, PHILLIP JACOB JR. in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.

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AF#4525 Decided by a vote of 4-0 to: (1) make a final determination that PAKISTANI AMERICAN PUBLIC AFFAIRS COMMITTEE PAK-PAC, and SHABNAM, SABA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Dickerson, Lindenbaum, and Trainor voted affirmatively for the decision. Commissioners Cooksey and Weintraub did not vote.



Attest:

**Laura e  
Sinram**

Digitally signed by  
Laura e Sinram  
Date: 2023.07.24  
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Laura E. Sinram  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

July 26, 2023

Michael Charles Gilliland, in official capacity as Treasurer  
Academy of Rail Labor Attorneys Political Action Committee  
603 Jonna Street  
Crozet, VA 22932-9326

C00636753  
AF#: 4512

Dear Michael Charles Gilliland,

On February 23, 2023, the Federal Election Commission ("the Commission" or "FEC") found reason to believe ("RTB") that Academy of Rail Labor Attorneys Political Action Committee and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2022 Pre-General Report. By letter dated February 24, 2023, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$2,255, in accordance with the schedule of penalties at 11 C.F.R. § 111.43.

On March 27, 2023, the FEC received payment of the civil money penalty calculated at the RTB stage. The Commission made a final determination on July 21, 2023 that Academy of Rail Labor Attorneys Political Action Committee and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$2,255, in accordance with 11 C.F.R. § 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 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

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

On behalf of the Commission,

A handwritten signature in black ink, appearing to read "Dara Lindenbaum".

Dara Lindenbaum  
Chair