



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE**

February 23, 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: *KDR* *BH*  
Kristin D. Roser/Ben Holly  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation - 2022 30-Day Post-General Report  
(Unauthorized Filers) for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2022 30-Day Post-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized committees that failed to file or timely file the 2022 30-Day Post-General Report.

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

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

- Every 30-Day Post-General Report (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 12-Day Pre-General Report (12G). If our research indicated that the filing of a 12G was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of activity was used by multiplying the total amount of activity on the report by 32.20% (19 days (12G Filing Period)/59 days (30G Filing Period)).
- The committees identified through this process as failing to file or failing to timely file the 12G were included in the Reason to Believe Recommendation circulated to the Commission on February 22, 2023. If the same committee also failed to file the 30G in a timely manner, we based the 30G fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12G from the total amount of activity on the 30G. In these cases, the committees will also be assessed a fine for the 30G based on the estimated levels of activity described above and are included on the attached list.
- Every Year-End Report (YE) submitted by an unauthorized quarterly filer that covered the period from October 1, 2022 through December 31, 2022 (92 days) was reviewed for activity which would have required the filing of a 30G. If our research indicated that a 30G was required, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 64.13% (59 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G. If the same committee was required to file the 12G, but failed to file this report, we utilized a three-step method to arrive at the activity on which to base the 30G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 30G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 43.48% (40 days (30G Filing Period)/92 days (YE Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 30G.

## **Recommendation**

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

Federal Election Commission  
Reason to Believe Circulation Report  
2022 POST-GENERAL Not Election Sensitive 12/08/2022 UNAUTH

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4526	C00426445	ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC)	MICHAEL DUBE	\$200,180	0	12/30/2022	22	\$2,231	\$173
4527	C00636753	ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE	MICHAEL CHARLES GILLILAND	\$333,298	0	1/27/2023	*Not Filed	\$18,023	\$806
4528	C00705384	AMERICA GREAT PAC	JASON PALLANTE	\$282,156	1	1/14/2023	*Not Filed	\$9,657	\$603
4529	C00413955	AMERICAN ASSOCIATION OF NEUROLOGICAL SURGEONS POLITICAL ACTION COMMITTEE (NEUROSURGERYPAC)	SEPIDEH AMIN-HANJANI	\$899,080	0	1/31/2023	*Not Filed	\$12,326	\$806
4530	C00000729	AMERICAN DENTAL ASSOCIATION POLITICAL ACTION COMMITTEE	MATTHEW J. NEARY	\$3,921,295	0	12/31/2022	23	\$305,825	\$10,436
4531	C00193854	AMERICAN PHARMACISTS ASSOCIATION POLITICAL ACTION COMMITTEE	SHANNON MORRISON	\$316,381	0	1/10/2023	*Not Filed	\$7,958	\$483
4532	C00774497	BIPARTISAN CLIMATE ACTION FUND	IAN HARRISON	\$448,752	0		Not Filed	\$74,792 (est)	\$4,624
4533	C00695544	BRAUN SOLUTIONS COMMITTEE	THOMAS C. DATWYLER	\$2,627,170	0	1/14/2023	*Not Filed	\$60,039	\$4,624
4534	C00790915	BRIDGE PAC	PATRICK CORRIGAN	\$252,393	0	1/31/2023	*Not Filed	\$692	\$402
4535	C00183962	CADENCE BANK PAC	MARTY ROWE	\$778,730	0	12/27/2022	19	\$32,058	\$950
4536	C00789933	CITIZENS ALLIANCE POLITICAL ACTION COMMITTEE INC.	ROBERT PHILLIPS III	\$1,123,569	0	12/23/2022	15	\$181,016	\$5,213
4537	C00528349	CLARK PAC	GEORGE PARKER CLARK	\$142,501	0	1/31/2023	*Not Filed	\$6,545	\$483
4538	C00215905	DFC COMMITTEE	JEF A. GREEN	\$3,397,655	0	12/29/2022	21	\$27,335	\$1,014

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4539	C00400317	FULTON FINANCIAL CORPORATION PAC	JOSE R. CABEZAS	\$134,394	0	12/19/2022	11	\$35,432	\$694
4540	C00818088	HAITIAN AMERICAN VOTES PAC	BENSON CHARLES	\$140,390	0		Not Filed	\$140,390 (est)	\$7,708
4541	C00756205	HINDUS OF GEORGIA PAC	SURESH KRISHNAMOORTHY	\$200,607	0	1/2/2023	25	\$30,488	\$1,142
4542	C00138966	INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 68 POLITICAL ACTION COMMITTEE	JOHN LOMBARDO	\$128,704	0	12/27/2022	19	\$11,000	\$286
4543	C00771832	LAKEVILLE ROAD POLITICAL ACTION COMMITTEE	ROBERT M. WERNER	\$159,114	0	1/13/2023	*Not Filed	\$13,549	\$806
4544	C00001743	LOCAL 1814 ILA POLITICAL ACTION AND EDUCATION FUND	FRANK J. AGOSTA	\$126,087	0		Not Filed	\$21,015 (est)	\$806
4545	C00817700	MANCHIN LEADERSHIP FUND	JACK ROSSI	\$398,033	0	12/15/2022	7	\$23,651	\$214
4546	C00690776	MICHIGAN LIBERATION ACTION FUND	RAIADA LANIER	\$243,711	0	12/20/2022	12	\$77,179	\$2,748
4547	C00398750	NEW PAC	TONI DIAN NUNES	\$1,742,370	0	1/24/2023	*Not Filed	\$57,342	\$4,624
4548	C00452763	NEW SOUTH LEADERSHIP PAC	SCOTT R. FALMLEN	\$103,694	0	12/23/2022	15	\$7,679	\$170
4549	C00749069	OUR BLACK PARTY	BETTY CRICHLow-EBERHARDT	\$323,047	2	1/17/2023	*Not Filed	\$2,669	\$603
4550	C00045781	OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE	KEN KLEIN	\$146,728	0	12/22/2022	14	\$8,000	\$164
4551	C00807958	PATRIOTS PAC LLC	MELVIN JOHNSON	\$400,312	0		Not Filed	\$200,156 (est)	\$11,132

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4552	C00519371	SOCIETY FOR CARDIOVASCULAR ANGIOGRAPHY AND INTERVENTIONS ASSOCIATION PAC	ARNOLD SETO	\$188,190	0	12/23/2022	15	\$32,081	\$822
4553	C00688069	SUPPORT AMERICAN LEADERS PAC	MATTHEW NELSON TUNSTALL	\$464,815	5		Not Filed	\$154,938 (est)	\$21,195
4554	C00455766	THE MOSAIC COMPANY POLITICAL ACTION COMMITTEE (MOSAICPAC)	CONNIE SHROYER	\$120,055	0	1/24/2023	*Not Filed	\$4,689	\$402
4555	C00521823	THE RIGHT GROUP	BARBARA KENNEDY	\$285,570	0	1/28/2023	*Not Filed	\$8,374	\$483
4556	C00626564	THE SEASONAL EMPLOYER PAC	PETER DELANY, JR.	\$214,313	0	2/7/2023	*Not Filed	\$8,437	\$483
4557	C00522458	TOGETHER WE THRIVE	CHRISTOPHER ZULLO	\$104,451	6		Not Filed	\$104,451 (est)	\$19,270
4558	C00484535	VOTESANE PAC	JAMES WILLIAMS	\$14,132,964	0	1/28/2023	*Not Filed	\$94,127	\$5,994
4559	C00616912	WOMEN VOTE SMART	AMY S. KREMER	\$145,616	8		Not Filed	\$145,616 (est)	\$23,124

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

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 Reason To Believe Recommendation – )  
 2022 30-Day Post-General Report )  
 (Unauthorized Filers) for the Administrative )  
 Fine Program: )  
 ABIOMED INC POLITICAL ACTION ) AF# 4526  
 COMMITTEE (ABIOMED PAC), and )  
 DUBE, MICHAEL as treasurer; )  
 ACADEMY OF RAIL LABOR ) AF# 4527  
 ATTORNEYS POLITICAL ACTION )  
 COMMITTEE, and GILLILAND, )  
 MICHAEL CHARLES as treasurer; )  
 AMERICA GREAT PAC, and JASON ) AF# 4528  
 PALLANTE as treasurer; )  
 AMERICAN ASSOCIATION OF ) AF# 4529  
 NEUROLOGICAL SURGEONS )  
 POLITICAL ACTION COMMITTEE )  
 (NEUROSURGERYPAC), and AMIN- )  
 HANJANI, SEPIDEH DR. as treasurer; )  
 AMERICAN DENTAL ASSOCIATION ) AF# 4530  
 POLITICAL ACTION COMMITTEE, and )  
 NEARY, MATTHEW J DR. as treasurer; )  
 AMERICAN PHARMACISTS ) AF# 4531  
 ASSOCIATION POLITICAL ACTION )  
 COMMITTEE, and MORRISON, )  
 SHANNON as treasurer; )  
 BIPARTISAN CLIMATE ACTION FUND, ) AF# 4532  
 and HARRISON, IAN as treasurer; )  
 BRAUN SOLUTIONS COMMITTEE, and ) AF# 4533  
 DATWYLER, THOMAS C. as treasurer; )  
 BRIDGE PAC, and CORRIGAN, ) AF# 4534  
 PATRICK as treasurer; )  
 CADENCE BANK PAC, and ROWE, ) AF# 4535  
 MARTY as treasurer; )  
 CITIZENS ALLIANCE POLITICAL ) AF# 4536  
 ACTION COMMITTEE INC., and )  
 PHILLIPS, ROBERT III as treasurer; )  
 CLARK PAC, and GEORGE PARKER ) AF# 4537  
 CLARK as treasurer; )  
 DFC COMMITTEE, and GREEN, JEF A as ) AF# 4538  
 treasurer; )

Federal Election Commission  
 Certification for Administrative Fines  
 February 24, 2023

FULTON FINANCIAL CORPORATION	)	AF# 4539
PAC, and CABEZAS, JOSE R. as treasurer;	)	
HAITIAN AMERICAN VOTES PAC, and	)	AF# 4540
CHARLES, BENSON MR as treasurer;	)	
HINDUS OF GEORGIA PAC, and	)	AF# 4541
KRISHNAMOORTHY, SURESH as	)	
treasurer;	)	
INTERNATIONAL UNION OF	)	AF# 4542
OPERATING ENGINEERS LOCAL 68	)	
POLITICAL ACTION COMMITTEE, and	)	
JOHN LOMBARDO as treasurer;	)	
LAKEVILLE ROAD POLITICAL	)	AF# 4543
ACTION COMMITTEE, and WERNER,	)	
ROBERT M as treasurer;	)	
LOCAL 1814 ILA POLITICAL ACTION	)	AF# 4544
AND EDUCATION FUND, and AGOSTA,	)	
FRANK J as treasurer;	)	
MANCHIN LEADERSHIP FUND, and	)	AF# 4545
ROSSI, JACK as treasurer;	)	
MICHIGAN LIBERATION ACTION	)	AF# 4546
FUND, and LANIER, RAIADA as	)	
treasurer;	)	
NEW PAC, and NUNES, TONI DIAN as	)	AF# 4547
treasurer;	)	
NEW SOUTH LEADERSHIP PAC, and	)	AF# 4548
FALMLEN, SCOTT R as treasurer;	)	
OUR BLACK PARTY, and CRICHLOW-	)	AF# 4549
EBERHARDT, BETTY as treasurer;	)	
OUTDOOR ADVERTISING	)	AF# 4550
ASSOCIATION OF AMERICA	)	
POLITICAL ACTION COMMITTEE, and	)	
KLEIN, KEN MR. as treasurer;	)	
PATRIOTS PAC LLC, and JOHNSON,	)	AF# 4551
MELVIN as treasurer;	)	
SOCIETY FOR CARDIOVASCULAR	)	AF# 4552
ANGIOGRAPHY AND	)	
INTERVENTIONS ASSOCIATION PAC,	)	
and SETO, ARNOLD DR as treasurer;	)	
SUPPORT AMERICAN LEADERS PAC,	)	AF# 4553
and TUNSTALL, MATTHEW NELSON as	)	
treasurer;	)	
THE MOSAIC COMPANY POLITICAL	)	AF# 4554
ACTION COMMITTEE (MOSAICPAC),	)	
and SHROYER, CONNIE as treasurer;	)	



THE RIGHT GROUP, and KENNEDY,	)	AF# 4555
BARBARA as treasurer;	)	
THE SEASONAL EMPLOYER PAC, and	)	AF# 4556
DELANY, PETER JR. as treasurer;	)	
TOGETHER WE THRIVE, and	)	AF# 4557
CHRISTOPHER ZULLO as treasurer;	)	
VOTESANE PAC, and WILLIAMS,	)	AF# 4558
JAMES as treasurer;	)	
WOMEN VOTE SMART, and KREMER,	)	AF# 4559
AMY S as treasurer;	)	

### CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on February 24, 2023 the Commission took the following actions on the Reason To Believe Recommendation – 2022 30-Day Post-General Report (Unauthorized Filers) for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated February 23, 2023, on the following committees:

AF#4526 Decided by a vote of 6-0 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4527 Decided by a vote of 6-0 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 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, Trainor, and Weintraub voted affirmatively for the decision.



AF#4528 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICA GREAT PAC, and JASON PALLANTE 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4529 Decided by a vote of 6-0 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4530 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN DENTAL ASSOCIATION POLITICAL ACTION COMMITTEE, and NEARY, MATTHEW J 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4531 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN PHARMACISTS ASSOCIATION POLITICAL ACTION COMMITTEE, and MORRISON, SHANNON 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4532 Decided by a vote of 6-0 to: (1) find reason to believe that BIPARTISAN CLIMATE ACTION FUND, and HARRISON, IAN 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4533 Decided by a vote of 6-0 to: (1) find reason to believe that BRAUN SOLUTIONS COMMITTEE, and DATWYLER, THOMAS C. 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4534 Decided by a vote of 6-0 to: (1) find reason to believe that BRIDGE PAC, and CORRIGAN, PATRICK 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4535 Decided by a vote of 6-0 to: (1) find reason to believe that CADENCE BANK PAC, and ROWE, MARTY 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4536 Decided by a vote of 6-0 to: (1) find reason to believe that CITIZENS ALLIANCE POLITICAL ACTION COMMITTEE INC., and PHILLIPS, ROBERT III 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4537 Decided by a vote of 6-0 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4538 Decided by a vote of 6-0 to: (1) find reason to believe that DFC COMMITTEE, and GREEN, JEF 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4539 Decided by a vote of 6-0 to: (1) find reason to believe that FULTON FINANCIAL CORPORATION PAC, and CABEZAS, JOSE R. 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4540 Decided by a vote of 6-0 to: (1) find reason to believe that HAITIAN AMERICAN VOTES PAC, and CHARLES, BENSON MR 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4541 Decided by a vote of 6-0 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4542 Decided by a vote of 6-0 to: (1) find reason to believe that INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL 68 POLITICAL ACTION COMMITTEE, and JOHN LOMBARDO 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4543 Decided by a vote of 6-0 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4544 Decided by a vote of 6-0 to: (1) find reason to believe that LOCAL 1814 ILA POLITICAL ACTION AND EDUCATION FUND, and AGOSTA, FRANK J 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4545 Decided by a vote of 6-0 to: (1) find reason to believe that MANCHIN LEADERSHIP FUND, and ROSSI, JACK 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4546 Decided by a vote of 6-0 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4547 Decided by a vote of 6-0 to: (1) find reason to believe that NEW PAC, and NUNES, TONI DIAN 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4548 Decided by a vote of 6-0 to: (1) find reason to believe that NEW SOUTH LEADERSHIP PAC, and FALMLEN, SCOTT R 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4549 Decided by a vote of 6-0 to: (1) find reason to believe that OUR BLACK PARTY, and CRICHLow-EBERHARDT, BETTY 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4550 Decided by a vote of 6-0 to: (1) find reason to believe that OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE, and KLEIN, KEN MR. 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4551 Decided by a vote of 6-0 to: (1) find reason to believe that PATRIOTS PAC LLC, and JOHNSON, MELVIN 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4552 Decided by a vote of 6-0 to: (1) find reason to believe that SOCIETY FOR CARDIOVASCULAR ANGIOGRAPHY AND INTERVENTIONS ASSOCIATION PAC, and SETO, ARNOLD 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4553 Decided by a vote of 6-0 to: (1) find reason to believe that SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4554 Decided by a vote of 6-0 to: (1) find reason to believe that THE MOSAIC COMPANY POLITICAL ACTION COMMITTEE (MOSAICPAC), and SHROYER, CONNIE 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4555 Decided by a vote of 6-0 to: (1) find reason to believe that THE RIGHT GROUP, and KENNEDY, BARBARA 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4556 Decided by a vote of 6-0 to: (1) find reason to believe that THE SEASONAL EMPLOYER PAC, and DELANY, PETER 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4557 Decided by a vote of 6-0 to: (1) find reason to believe that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO 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, Trainor, and Weintraub voted affirmatively for the decision.

AF#4558 Decided by a vote of 6-0 to: (1) find reason to believe that VOTESANE PAC, and WILLIAMS, JAMES 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, Trainor, and Weintraub voted affirmatively for the decision.

Federal Election Commission  
Certification for Administrative Fines  
February 24, 2023

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AF#4559 Decided by a vote of 6-0 to: (1) find reason to believe that WOMEN VOTE SMART, and KREMER, AMY S 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, Trainor, and Weintraub voted affirmatively for the decision.



Attest:

**Vicktoria J Allen**

Digitally signed by Vicktoria J  
Allen  
Date: 2023.02.27 14:04:35 -05'00'

Vicktoria J. Allen  
Deputy Secretary of the Commission





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AF

February 28, 2023

Jason Pallante, in official capacity as Treasurer  
America Great PAC  
1420 North St. NW  
Washington, DC 20005

C00705384

AF#: 4528  
FINE: \$603

Dear Jason Pallante,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 30-Day Post-General Report of Receipts and Disbursements in a calendar year in which a regularly scheduled general election is held. This report, covering the period October 1, 2022 through November 28, 2022 shall be filed no later than December 8, 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 within thirty (30) days of the due date, 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 24, 2023, the Commission found that there is reason to believe ("RTB") that America Great PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before December 8, 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 \$603. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.55. 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 \$603 is due within forty (40) days of the finding, or by April 5, 2023, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$9,657

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purpose of calculating the penalty)



AMERICA GREAT PAC

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Number of Previous Civil Money Penalties Assessed: 1

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 5, 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.

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

AMERICA GREAT PAC

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signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the date they are 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 America Great PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701, et seq. The 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**

### **Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the

AMERICA GREAT PAC

Page 4 of 4

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



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**SENSITIVE**

October 30, 2023

**MEMORANDUM**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser *KDR* / Jamie Sikorsky *JS*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the 2022 30-Day Post-General Report (Unauthorized Filers)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2022 30-Day Post-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the 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.

Please note, the Reports Analysis Division (RAD) recommends that the Commission take no further action against Support American Leaders PAC (AF 4553). On May 19, 2023 and June 28, 2023, respectively, the Commission approved the recommendations to take no further action against the Committee for failing to file the 2022 July Quarterly Report (AF 4378) and 2022 October Quarterly Report (AF 4461). This recommendation aligns with prior Commission actions

which have allowed for the exclusion and removal of defunct committees. Please see the detailed explanation below to support this recommendation.

Support American Leaders PAC was the subject of five (5) Administrative Fine matters in which the Committee was assessed civil money penalties totaling \$76,500 (AF cases 3828, 3900, 3950, 4187, and 4319). The Committee paid \$55 towards these fines and all cases have been transferred to the U.S. Department of the Treasury (“Treasury”) for collection.

The last report filed by the Committee was the 2021 Year-End Report on January 4, 2022, disclosing an ending cash-on-hand balance of negative \$267,554.80. The Committee has not responded to Commission requests to file missing reports. Further, the Committee’s Treasurer, Matthew Tunstall, was recently convicted on charges related to the operation of this PAC<sup>1</sup>.

For your information, three (3) committees disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty. An overview of these cases has been provided below.

Bipartisan Climate Action Fund (AF 4532) filed the 2022 30-Day Post-General Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$2,729 (previously estimated to be \$74,792), thus the fine would be lowered from \$4,624 to \$402.

Patriots PAC LLC (AF 4551) filed the 2022 30-Day Post-General Report after the RTB finding and disclosed an actual level of activity which would result in a lowered civil money penalty than that assessed at RTB. The committee disclosed total receipts and disbursements of \$0 (previously estimated to be \$200,156), thus the fine would be lowered from \$11,132 to \$0.

Women Vote Smart (AF 4559) disclosed no activity after the RTB finding (previously estimated to be \$145,616), which would result in no civil money penalty (fine previously assessed to be \$23,124).

For your information, three (3) committees disclosed a change in treasurer after the RTB finding and one (1) committee disclosed a change in committee name after the RTB finding. An overview of these cases has been provided below.

Abiomed Inc Political Action Committee (Abiomed PAC) (AF 4526) filed an Amended Statement of Organization after the RTB finding designating Justin Limoli as Treasurer.

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<sup>1</sup>Per the United States District Court Western District of Texas (Case 1:21-CR-00223-LY), Mr. Tunstall was sentenced to one hundred and twenty (120) months of imprisonment on April 24, 2023.  
<https://storage.courtlistener.com/recap/gov.uscourts.txwd.1152054/gov.uscourts.txwd.1152054.138.0.pdf>

American Dental Association Political Action Committee (AF 4530) filed an Amended Statement of Organization after the RTB finding designating Terry Barnfield as Treasurer.

Outdoor Advertising Association of America Political Action Committee (AF 4550) filed an Amended Statement of Organization after the RTB finding designating Michael S. Hershey as Treasurer.

New PAC (AF 4547) filed an Amended Statement of Organization after the RTB finding changing the committee name to Freedom For America (FFA PAC).

### **RAD Recommendation**

- (1) Take no further action against Support American Leaders PAC (AF 4553), and its treasurer, in their official capacity.
- (2) 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.
- (3) Make a final determination that the political committee and its treasurers, in their official capacity, listed on the attached report with no activity, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty.
- (4) Send the appropriate letters.

Federal Election Commission  
FD Circulation Report Fine Paid  
2022 POST-GENERAL Not Election Sensitive 12/08/2022 UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
4526	ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC)		C00426445	JUSTIN LIMOLI	12/30/2022	22	\$2,231	0	02/24/2023	\$173	\$173	03/09/2023	\$173
4527	ACADEMY OF RAIL LABOR ATTORNEYS POLITICAL ACTION COMMITTEE		C00636753	MICHAEL CHARLES GILLILAND	01/27/2023	*Not Filed	\$18,023	0	02/24/2023	\$806	\$806	03/27/2023	\$806
4529	AMERICAN ASSOCIATION OF NEUROLOGICAL SURGEONS POLITICAL ACTION COMMITTEE (NEUROSURGERYPAC)		C00413955	SEPIDEH AMIN-HANJANI	01/31/2023	*Not Filed	\$12,326	0	02/24/2023	\$806	\$806	08/22/2023	\$806
4530	AMERICAN DENTAL ASSOCIATION POLITICAL ACTION COMMITTEE		C00000729	TERRY BARNFIELD	12/31/2022	23	\$307,825	0	02/24/2023	\$10,436	\$10,436	03/31/2023	\$10,436
4533	BRAUN SOLUTIONS COMMITTEE		C00695544	THOMAS C. DATWYLER	01/14/2023	*Not Filed	\$60,039	0	02/24/2023	\$4,624	\$4,624	03/03/2023	\$4,624
4535	CADENCE BANK PAC		C00183962	MARTY ROWE	12/27/2022	19	\$32,058	0	02/24/2023	\$950	\$950	03/06/2023	\$950
4536	CITIZENS ALLIANCE POLITICAL ACTION COMMITTEE INC.		C00789933	ROBERT PHILLIPS III	12/23/2022	15	\$181,016	0	02/24/2023	\$5,213	\$5,213	03/07/2023	\$5,213
4537	CLARK PAC		C00528349	GEORGE PARKER CLARK	01/31/2023	*Not Filed	\$6,545	0	02/24/2023	\$483	\$483	04/03/2023	\$483
4538	DFC COMMITTEE		C00215905	JEF A. GREEN	12/29/2022	21	\$27,335	0	02/24/2023	\$1,014	\$1,014	04/05/2023	\$1,014
4539	FULTON FINANCIAL CORPORATION PAC		C00400317	JOSE R. CABEZAS	12/19/2022	11	\$35,432	0	02/24/2023	\$694	\$694	03/15/2023	\$694
4541	HINDUS OF GEORGIA PAC		C00756205	SURESH KRISHNAMOORTHY	01/02/2023	25	\$30,488	0	02/24/2023	\$1,142	\$1,142	03/07/2023	\$1,142
4543	LAKEVILLE ROAD POLITICAL ACTION COMMITTEE		C00771832	ROBERT M. WERNER	01/13/2023	*Not Filed	\$13,538	0	02/24/2023	\$806	\$806	04/06/2023	\$806
4544	LOCAL 1814 ILA POLITICAL ACTION AND EDUCATION FUND		C00001743	FRANK AGOSTA	03/02/2023	*Not Filed	\$29,963	0	02/24/2023	\$806	\$806	05/10/2023	\$806
4545	MANCHIN LEADERSHIP FUND		C00817700	JACK ROSSI	12/15/2022	7	\$23,651	0	02/24/2023	\$214	\$214	04/12/2023	\$214
4546	MICHIGAN LIBERATION ACTION FUND		C00690776	RAIADA LANIER	12/20/2022	12	\$77,179	0	02/24/2023	\$2,748	\$2,748	03/22/2023	\$2,748
4547	FREEDOM FOR AMERICA (FFA PAC)		C00398750	TONI DIAN NUNES	01/24/2023	*Not Filed	\$57,342	0	02/24/2023	\$4,624	\$4,624	03/03/2023	\$4,624
4548	NEW SOUTH LEADERSHIP PAC		C00452763	SCOTT R. FALMLEN	12/23/2022	15	\$7,679	0	02/24/2023	\$170	\$170	03/16/2023	\$170
4550	OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE		C00045781	MICHAEL S. HERSHEY	12/22/2022	14	\$8,000	0	02/24/2023	\$164	\$164	03/07/2023	\$164
4552	SOCIETY FOR CARDIOVASCULAR ANGIOGRAPHY AND INTERVENTIONS ASSOCIATION PAC		C00519371	ARNOLD SETO	12/23/2022	15	\$32,081	0	02/24/2023	\$822	\$822	03/22/2023	\$822
4554	THE MOSAIC COMPANY POLITICAL ACTION COMMITTEE (MOAICPAC)		C00455766	CONNIE SHROYER	01/24/2023	*Not Filed	\$4,693	0	02/24/2023	\$402	\$402	04/14/2023	\$402



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
4555	THE RIGHT GROUP		C00521823	BARBARA KENNEDY	01/28/2023	*Not Filed	\$8,374	0	02/24/2023	\$483	\$483	04/14/2023	\$483

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

Federal Election Commission  
FD Circulation Report Fine Not Paid  
2022 POST-GENERAL Not Election Sensitive 12/08/2022 UNAUTH

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
4528	AMERICA GREAT PAC		C00705384	JASON PALLANTE	01/14/2023	*Not Filed	\$9,657	1	02/24/2023	\$603	248	\$603
4532	BIPARTISAN CLIMATE FUND		C00774497	IAN HARRISON	03/30/2023	*Not Filed	\$2,729	0	02/24/2023	\$4,624	248	\$402
4540	HAITIAN AMERICAN VOTES PAC		C00818088	BENSON CHARLES		Not Filed	\$140,390 (est)	0	02/24/2023	\$7,708	248	\$7,708
4549	OUR BLACK PARTY		C00749069	BETTY CRICHLow-EBERHARDT	01/17/2023	*Not Filed	\$2,669	2	02/24/2023	\$603	248	\$603
4551	PATRIOTS PAC LLC		C00807958	MELVIN JOHNSON	03/30/2023	*Not Filed	\$0	0	02/24/2023	\$11,132	248	NONE
4553	SUPPORT AMERICAN LEADERS PAC		C00688069	MATTHEW NELSON TUNSTALL		Not Filed	\$154,938 (est)	5	02/24/2023	\$21,195	248	NFA
4556	THE SEASONAL EMPLOYER PAC		C00626564	PETER DELANY, JR.	02/07/2023	*Not Filed	\$8,437	0	02/24/2023	\$483	248	\$483
4557	TOGETHER WE THRIVE		C00522458	CHRISTOPHER ZULLO		Not Filed	\$104,451 (est)	6	02/24/2023	\$19,270	248	\$19,270
4558	VOTESANE PAC		C00484535	JAMES WILLIAMS	01/28/2023	*Not Filed	\$196,147	0	02/24/2023	\$5,994	248	\$5,994
4559	WOMEN VOTE SMART		C00616912	AMY S KREMER		**Not Filed	\$0	8	02/24/2023	\$23,124	248	NONE

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

\*\* The committee filed a Form 99 (Miscellaneous Electronic Submission) disclosing no activity for the 2022 30-Day Post-General reporting period.

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Administrative Fine Program – Final	)	
Determination Recommendation for the	)	
2022 30-Day Post-General Report	)	
(Unauthorized Filers):	)	
ABIOMED INC POLITICAL ACTION	)	AF# 4526
COMMITTEE (ABIOMED PAC), and	)	
LIMOLI, JUSTIN as treasurer;	)	
ACADEMY OF RAIL LABOR	)	AF# 4527
ATTORNEYS POLITICAL ACTION	)	
COMMITTEE, and GILLILAND,	)	
MICHAEL CHARLES as treasurer;	)	
AMERICA GREAT PAC, and JASON	)	AF# 4528
PALLANTE as treasurer;	)	
AMERICAN ASSOCIATION OF	)	AF# 4529
NEUROLOGICAL SURGEONS	)	
POLITICAL ACTION COMMITTEE	)	
(NEUROSURGERYPAC), and AMIN-	)	
HANJANI, SEPIDEH DR. as treasurer;	)	
AMERICAN DENTAL ASSOCIATION	)	AF# 4530
POLITICAL ACTION COMMITTEE, and	)	
BARNFIELD, TERRY DR. as treasurer;	)	
BIPARTISAN CLIMATE FUND, and	)	AF# 4532
HARRISON, IAN as treasurer;	)	
BRAUN SOLUTIONS COMMITTEE, and	)	AF# 4533
DATWYLER, THOMAS C. as treasurer;	)	
CADENCE BANK PAC, and ROWE,	)	AF# 4535
MARTY as treasurer;	)	
CITIZENS ALLIANCE POLITICAL	)	AF# 4536
ACTION COMMITTEE INC., and	)	
PHILLIPS, ROBERT III as treasurer;	)	
CLARK PAC, and GEORGE PARKER	)	AF# 4537
CLARK as treasurer;	)	
DFC COMMITTEE, and GREEN, JEF A as	)	AF# 4538
treasurer;	)	
FULTON FINANCIAL CORPORATION	)	AF# 4539
PAC, and CABEZAS, JOSE R. as treasurer;	)	
HAITIAN AMERICAN VOTES PAC, and	)	AF# 4540
CHARLES, BENSON MR as treasurer;	)	
HINDUS OF GEORGIA PAC, and	)	AF# 4541
KRISHNAMOORTHY, SURESH as	)	
treasurer;	)	
LAKEVILLE ROAD POLITICAL	)	AF# 4543
ACTION COMMITTEE, and WERNER,	)	
ROBERT M as treasurer;	)	

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LOCAL 1814 ILA POLITICAL ACTION )	AF# 4544
AND EDUCATION FUND, and AGOSTA, )	
FRANK as treasurer; )	
MANCHIN LEADERSHIP FUND, and )	AF# 4545
ROSSI, JACK as treasurer; )	
MICHIGAN LIBERATION ACTION )	AF# 4546
FUND, and LANIER, RAIADA as )	
treasurer; )	
FREEDOM FOR AMERICA (FFA PAC), )	AF# 4547
and NUNES, TONI DIAN as treasurer; )	
NEW SOUTH LEADERSHIP PAC, and )	AF# 4548
FALMLEN, SCOTT R as treasurer; )	
OUR BLACK PARTY, and CRICHLOW- )	AF# 4549
EBERHARDT, BETTY as treasurer; )	
OUTDOOR ADVERTISING )	AF# 4550
ASSOCIATION OF AMERICA )	
POLITICAL ACTION COMMITTEE, and )	
HERSHEY, MICHAEL S as treasurer; )	
PATRIOTS PAC LLC, and JOHNSON, )	AF# 4551
MELVIN as treasurer; )	
SOCIETY FOR CARDIOVASCULAR )	AF# 4552
ANGIOGRAPHY AND )	
INTERVENTIONS ASSOCIATION PAC, )	
and SETO, ARNOLD DR as treasurer; )	
SUPPORT AMERICAN LEADERS PAC, )	AF# 4553
and TUNSTALL, MATTHEW NELSON as )	
treasurer; )	
THE MOSAIC COMPANY POLITICAL )	AF# 4554
ACTION COMMITTEE (MOAICPAC), )	
and SHROYER, CONNIE as treasurer; )	
THE RIGHT GROUP, and KENNEDY, )	AF# 4555
BARBARA as treasurer; )	
THE SEASONAL EMPLOYER PAC, and )	AF# 4556
DELANY, PETER JR. as treasurer; )	
TOGETHER WE THRIVE, and )	AF# 4557
CHRISTOPHER ZULLO as treasurer; )	
VOTESANE PAC, and WILLIAMS, )	AF# 4558
JAMES as treasurer; )	
WOMEN VOTE SMART, and KREMER, )	AF# 4559
AMY S as treasurer; )	

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on November 01, 2023 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2022 30-Day Post-General Report (Unauthorized Filers), as recommended in the Reports Analysis Division's Memorandum dated October 30, 2023, on the following committees:

AF#4526 Decided by a vote of 6-0 to: (1) make a final determination that ABIOMED INC POLITICAL ACTION COMMITTEE (ABIOMED PAC), and LIMOLI, JUSTIN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4527 Decided by a vote of 6-0 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 appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4528 Decided by a vote of 6-0 to: (1) make a final determination that AMERICA GREAT PAC, and JASON PALLANTE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4529 Decided by a vote of 6-0 to: (1) make a final determination 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 assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4530 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN DENTAL ASSOCIATION POLITICAL ACTION COMMITTEE, and BARNFIELD, TERRY DR. in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4532 Decided by a vote of 6-0 to: (1) make a final determination that BIPARTISAN CLIMATE FUND, and HARRISON, IAN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4533 Decided by a vote of 6-0 to: (1) make a final determination that BRAUN SOLUTIONS COMMITTEE, and DATWYLER, THOMAS C. in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4535 Decided by a vote of 6-0 to: (1) make a final determination that CADENCE BANK PAC, and ROWE, MARTY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4536 Decided by a vote of 6-0 to: (1) make a final determination that CITIZENS ALLIANCE POLITICAL ACTION COMMITTEE INC., and PHILLIPS, ROBERT III in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4537 Decided by a vote of 6-0 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, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4538 Decided by a vote of 6-0 to: (1) make a final determination that DFC COMMITTEE, and GREEN, JEF A in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4539 Decided by a vote of 6-0 to: (1) make a final determination that FULTON FINANCIAL CORPORATION PAC, and CABEZAS, JOSE R. in their official capacity

as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4540 Decided by a vote of 6-0 to: (1) make a final determination that HAITIAN AMERICAN VOTES PAC, and CHARLES, BENSON MR in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4541 Decided by a vote of 6-0 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, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4543 Decided by a vote of 6-0 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, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4544 Decided by a vote of 6-0 to: (1) make a final determination that LOCAL 1814 ILA POLITICAL ACTION AND EDUCATION FUND, and AGOSTA, FRANK in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4545 Decided by a vote of 6-0 to: (1) make a final determination that MANCHIN LEADERSHIP FUND, and ROSSI, JACK in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4546 Decided by a vote of 6-0 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, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4547 Decided by a vote of 6-0 to: (1) make a final determination that FREEDOM FOR AMERICA (FFA PAC), and NUNES, TONI DIAN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money



penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4548 Decided by a vote of 6-0 to: (1) make a final determination that NEW SOUTH LEADERSHIP PAC, and FALMLEN, SCOTT R in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4549 Decided by a vote of 6-0 to: (1) make a final determination that OUR BLACK PARTY, and CRICHLow-EBERHARDT, BETTY in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4550 Decided by a vote of 6-0 to: (1) make a final determination that OUTDOOR ADVERTISING ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE, and HERSHEY, MICHAEL S in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4551 Decided by a vote of 6-0 to: (1) make a final determination that PATRIOTS PAC LLC, and JOHNSON, MELVIN in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4552 Decided by a vote of 6-0 to: (1) make a final determination that SOCIETY FOR CARDIOVASCULAR ANGIOGRAPHY AND INTERVENTIONS ASSOCIATION PAC, and SETO, ARNOLD DR in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4553 Decided by a vote of 6-0 to: (1) take no further action against SUPPORT AMERICAN LEADERS PAC, and TUNSTALL, MATTHEW NELSON in their official capacity as treasurer; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4554 Decided by a vote of 6-0 to: (1) make a final determination that THE MOSAIC COMPANY POLITICAL ACTION COMMITTEE (MOSAICPAC), and SHROYER, CONNIE in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

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AF#4555 Decided by a vote of 6-0 to: (1) make a final determination that THE RIGHT GROUP, and KENNEDY, BARBARA in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4556 Decided by a vote of 6-0 to: (1) make a final determination that THE SEASONAL EMPLOYER PAC, and DELANY, PETER 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, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4557 Decided by a vote of 6-0 to: (1) make a final determination that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4558 Decided by a vote of 6-0 to: (1) make a final determination that VOTESANE PAC, and WILLIAMS, JAMES in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.

AF#4559 Decided by a vote of 6-0 to: (1) make a final determination that WOMEN VOTE SMART, and KREMER, AMY S in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and will not be assessed a civil money penalty; (2) send the appropriate letter. Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voted affirmatively for the decision.



Attest:

**Vicktoria J Allen**

Digitally signed by Vicktoria J  
 Allen  
 Date: 2023.11.03 15:07:56 -04'00'

Vicktoria J. Allen  
 Deputy Secretary of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

AF

November 3, 2023

Jason Pallante, in official capacity as Treasurer  
America Great PAC  
1420 North St NW  
Washington, DC 20005

C00705384

AF#: 4528

Dear Jason Pallante,

On February 24, 2023, the Federal Election Commission ("the Commission" or "FEC") found reason to believe ("RTB") that America Great PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2022 30-Day Post-General Report. By letter dated February 28, 2023, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$603, in accordance with the schedule of penalties at 11 C.F.R. § 111.43.

On October 27, 2023, the FEC received payment of the civil money penalty calculated at the RTB stage. The Commission made a final determination on October 31, 2023 that America Great PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$603, 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 Jamie Sikorsky on our toll-free number (800) 424-9530 (at the prompt press 5) or (202) 694-1137.

On behalf of the Commission,

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

Dara Lindenbaum  
Chair