



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 CRICLOW-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.

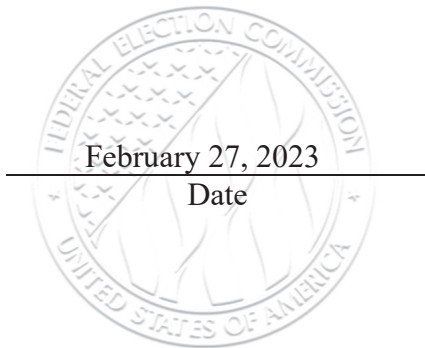
AF#4557 Decided by a vote of 6-0 to: (1) find reason to believe that TOGETHER WE THRIVE, and CHRISTOPHER ZULLO in their official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send 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

Matthew Nelson Tunstall, in official capacity as Treasurer  
Support American Leaders PAC  
1601 Elm Street  
Dallas, TX 75201

C00688069  
AF#: 4553  
FINE: \$21,195

Dear Matthew Nelson Tunstall,

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. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On February 24, 2023, the Commission found that there is reason to believe ("RTB") that Support American Leaders 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 \$21,195. 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 \$21,195 is due within forty (40) days of the finding, or by April 5, 2023, and is based on these factors:

Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$154,938  
Number of Days Late: Not Filed

SUPPORT AMERICAN LEADERS PAC

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Number of Previous Civil Money Penalties Assessed: 5

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



## SUPPORT AMERICAN LEADERS 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 are true and make a final determination that Support American Leaders 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 amount of your partial payment will be credited towards the full civil money penalty that

SUPPORT AMERICAN LEADERS PAC

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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;                  | ) |          |

Federal Election Commission  
 Certification for Administrative Fines  
 November 1, 2023

|                                      |          |
|--------------------------------------|----------|
| 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 (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 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

Matthew Nelson Tunstall, in official capacity as Treasurer  
Support American Leaders PAC  
1601 Elm Street  
Dallas, TX 75201

C00688069

AF#: 4553

Dear Matthew Nelson Tunstall,

On February 24, 2023, the Federal Election Commission ("the Commission" or "FEC") found reason to believe ("RTB") that Support American Leaders 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 \$21,195, in accordance with the schedule of penalties at 11 C.F.R. § 111.43.

The FEC made a final determination on October 31, 2023 to take no further action against Support American Leaders PAC and you, in your official capacity as treasurer, assessed no civil money penalty, 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