FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

June 25, 2024

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer
Staff Director AP

FROM: Patricia C. Orrock PCO
Chief Compliance Officer

Debbie Chacona DC
Assistant Staff Director
Reports Analysis Division

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

SUBJECT: Reason To Believe Recommendation – 2024 May Monthly Report for the Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2024 May Monthly Report in accordance with 52 U.S.C. § 30104(a). The May Monthly Report was due on May 20, 2024.

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

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.

6/24/2024 12:03 PM

Federal Election Commission
Reason to Believe Circulation Report
2024 MAY MONTHLY Not Election Sensitive 05/20/2024 P_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
4732	C00283135	NATIONAL ASSOCIATION OF BENEFITS AND INSURANCE PROFESSIONALS PAC (NABIP PAC)		DEBRA ADLIS	$1,305,426	0	5/31/2024	11	$24,970	$244
4733	C00390641	TULARE COUNTY REPUBLICAN CENTRAL COMMITTEE (FEDERAL)		CRYSTAL RAGAN	$111,126	0	6/5/2024	16	$18,687	$274

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Reason To Believe Recommendation –	)	
2024 May Monthly Report for the	)	
Administrative Fine Program:	)	
NATIONAL ASSOCIATION OF	)	AF# 4732
BENEFITS AND INSURANCE	)	
PROFESSIONALS PAC (NABIP PAC),	)	
and ADLIS, DEBRA as treasurer;	)	
TULARE COUNTY REPUBLICAN	)	AF# 4733
CENTRAL COMMITTEE (FEDERAL),	)	
and RAGAN, CRYSTAL as treasurer;	)	

CERTIFICATION

I, Vicktoria J. Allen, Deputy Secretary of the Federal Election Commission, do hereby certify that on June 27, 2024 the Commission took the following actions on the Reason To Believe Recommendation – 2024 May Monthly Report for the Administrative Fine Program, as recommended in the Reports Analysis Division's Memorandum dated June 25, 2024, on the following committees:

AF#4732 Decided by a vote of 4-0 to: (1) find reason to believe that NATIONAL ASSOCIATION OF BENEFITS AND INSURANCE PROFESSIONALS PAC (NABIP PAC), and ADLIS, DEBRA 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, Trainor, and Weintraub voted affirmatively for the decision. Commissioners Dickerson and Lindenbaum did not vote.

AF#4733 Decided by a vote of 4-0 to: (1) find reason to believe that TULARE COUNTY REPUBLICAN CENTRAL COMMITTEE (FEDERAL), and RAGAN, CRYSTAL 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, Trainor,

and Weintraub voted affirmatively for the decision. Commissioners Dickerson and Lindenbaum did not vote.

June 28, 2024
Date

Attest:

Vicktoria J Allen

Digitally signed by Vicktoria J Allen
Date: 2024.06.28 17:22:13 -04'00'

Vicktoria J. Allen
Deputy Secretary of the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

July 1, 2024

Debra Adlis, in official capacity as Treasurer
National Association of Benefits and Insurance Professionals PAC (NABIP PAC)
999 E Street, NW
Suite 400
Washington, DC 20004

C00283135
AF#: 4732
FINE: $244

Dear Debra Adlis,

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a May Monthly Report of Receipts and Disbursements covering the period April 1, 2024 through April 30, 2024. This report shall be filed no later than May 20, 2024. 52 U.S.C. § 30104(a). Records at the Federal Election Commission (the "Commission" or "FEC") indicate that this report was filed on May 31, 2024, 11 days late.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On June 27, 2024, the Commission found that there is reason to believe ("RTB") that National Association of Benefits and Insurance Professionals PAC (NABIP 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 May 20, 2024. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is $244. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 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 CFR § 111.34. Your payment of $244 is due within forty (40) days of the finding, or by August 6, 2024, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive
Level of Activity: $24,970
Number of Days Late: 11
Number of Previous Civil Money Penalties Assessed: 0

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

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

If you decide to challenge the RTB finding and/or calculated civil money penalty, you must email a written response to the FEC's Office of Administrative Review at administrativefines@fec.gov. 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 August 6, 2024. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

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 CFR § 111.35(b). For a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. Id. Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience, or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

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 CFR § 111.38.

It should also be noted that all challenges to an RTB finding and/or calculated civil money penalty should be converted to Portable Document Format ("PDF") and emailed to administrativefines@fec.gov. The Commission encourages the use of electronic signatures on electronically submitted documents, but scanned copies of ink signatures will be accepted. Electronically submitted challenges will be deemed received on the

date 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 National Association of Benefits and Insurance Professionals PAC (NABIP 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 CFR § 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

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 CFR § 111.42.

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

On behalf of the Commission,

Sean J. Cooksey
Chairman

AF473200009

RECEIVED
By Office of the Commission Secretary at 10:07 am, Nov 06, 2024

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

SENSITIVE

November 6, 2024

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/Ben Holly BH
Reports Analysis Division
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the 2024 May Monthly Report

Attached is a list 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 2024 May Monthly Report. The committees have paid the civil money penalties requested at RTB.

In accordance with 11 CFR § 111.34, the Commission shall send a final determination notice to those respondents that have paid the civil money penalty.

RAD Recommendation

(1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached report violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.

(2) Send the appropriate letters.

Federal Election Commission
FD Circulation Report Fine Paid
2024 MAY MONTHLY Not Election Sensitive 05/20/2024 P_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
4732	NATIONAL ASSOCIATION OF BENEFITS AND INSURANCE PROFESSIONALS PAC (NABIP PAC)		C00283135	DEBRA ADLIS	05/31/2024	11	$24,970	0	06/27/2024	$244	$244	07/17/2024	$244
4733	TULARE COUNTY REPUBLICAN CENTRAL COMMITTEE (FEDERAL)		C00390641	CRYSTAL RAGAN	06/05/2024	16	$18,687	0	06/27/2024	$274	$274	07/16/2024	$274

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Administrative Fine Program – Final Determination Recommendation for the 2024 May Monthly Report:	)	
NATIONAL ASSOCIATION OF BENEFITS AND INSURANCE PROFESSIONALS PAC (NABIP PAC), and ADLIS, DEBRA as treasurer;	)	AF# 4732
TULARE COUNTY REPUBLICAN CENTRAL COMMITTEE (FEDERAL), and RAGAN, CRYSTAL as treasurer;	)	AF# 4733

CERTIFICATION

I, Laura E. Sinram, Secretary and Clerk of the Federal Election Commission, do hereby certify that on November 07, 2024 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2024 May Monthly Report, as recommended in the Reports Analysis Division's Memorandum dated November 06, 2024, on the following committees:

AF#4732 Decided by a vote of 6-0 to: (1) make a final determination that NATIONAL ASSOCIATION OF BENEFITS AND INSURANCE PROFESSIONALS PAC (NABIP PAC), and ADLIS, DEBRA 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#4733 Decided by a vote of 6-0 to: (1) make a final determination that TULARE COUNTY REPUBLICAN CENTRAL COMMITTEE (FEDERAL), and RAGAN, CRYSTAL 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.

November 7, 2024
Date

Attest:

Laura E Sinram

Digitally signed by Laura E Sinram
Date: 2024.11.07 16:13:45 -05'00'

Laura E. Sinram
Secretary and Clerk of the Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

AF

November 7, 2024

Debra Adlis, in official capacity as Treasurer
National Association of Benefits and Insurance Professionals PAC (NABIP PAC)
999 E Street, NW
Suite 400
Washington, DC 20004

C00283135
AF#: 4732

Dear Debra Adlis,

On June 27, 2024, the Federal Election Commission ("the Commission" or "FEC") found reason to believe ("RTB") that National Association of Benefits and Insurance Professionals PAC (NABIP PAC) and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2024 May Monthly Report. By letter dated July 1, 2024, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling $244, in accordance with the schedule of penalties at 11 CFR § 111.43.

On July 17, 2024, the FEC received payment of the civil money penalty calculated at the RTB stage. The Commission made a final determination on November 7, 2024 that National Association of Benefits and Insurance Professionals PAC (NABIP 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 $244, in accordance with 11 CFR § 111.43, and voted to close the file.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

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

On behalf of the Commission,

Sean J. Cooksey
Chairman