

21L-32

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: May 25, 2021

ANALYST: Abigail Capps

- I. COMMITTEE: American Crystal Sugar Company
Political Action Committee
C00110338
Lisa Maloy, Treasurer
101 North 3rd Street
Moorhead, MN 56560-1990
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(4)
52 U.S.C. § 30116(a)(2)
11 CFR § 104.3(b)
11 CFR §110.1(b)(1) and (3)
11 CFR §110.2(b)

III. BACKGROUND:

Excessive, Prohibited and Other Impermissible Contributions: Failure to Refund or Redesignate Impermissible Contributions within the Permissible Timeframe

During the 2020 calendar year, American Crystal Sugar Company Political Action Committee (“the Committee”) disclosed nine (9) apparently impermissible contributions totaling \$45,000.00, made to Federal candidate committees after the date of the election. The apparently impermissible contributions were reported on the Committee’s 2020 April Monthly, 2020 May Monthly, 2020 June Monthly, and 2020 July Monthly Reports (Attachment 2).

2020 April Monthly Report

On April 16, 2020, the Committee filed the 2020 April Monthly Report, covering the period from March 1, 2020 through March 31, 2020. The report disclosed \$10,000.00 in apparently impermissible contributions to two (2) Federal candidate committees made after the date of the election on Schedule B, supporting Line 23 (Contributions to Federal Candidates/Committees and Other Political Committees) (Image 202004169219665082).

On May 19, 2020, a Request for Additional Information (RFAI) was sent to the Committee referencing the 2020 April Monthly Report. The RFAI requested clarification regarding the disbursement of apparently impermissible contributions. A chart was included with the RFAI identifying the apparently impermissible contributions made to two (2) Federal candidate committees after the date of the election (Images 202005190300071294-96).

On October 15, 2020, the Committee filed an Amended 2020 April Monthly Report. The report disclosed no change in contributions to Federal candidate committees on Schedule B, supporting Line 23 from the original report (Image 202010159294209520).

2020 May Monthly Report

On May 19, 2020, the Committee filed the 2020 May Monthly Report, covering the period from April 1, 2020 through April 30, 2020. The report disclosed \$5,000.00 in an apparently impermissible contribution to one (1) Federal candidate committee made after the date of the election on Schedule B, supporting Line 23 (Image 202005199232802455).

On June 3, 2020, an RFAI was sent to the Committee referencing the 2020 May Monthly Report. The RFAI requested clarification regarding the disbursement of an apparently impermissible contribution. A chart was included with the RFAI identifying an apparently impermissible contribution made to one (1) Federal candidate committee after the date of the election (Images 202006040300073669-71).

On October 15, 2020, the Committee filed an Amended 2020 May Monthly Report. The report disclosed no change in contributions to Federal candidate committees on Schedule B, supporting Line 23 from the original report (Image 202010159294213830).

2020 June Monthly Report

On June 17, 2020, the Committee filed the 2020 June Monthly Report, covering the period from May 1, 2020 through May 31, 2020. The report disclosed \$20,000.00 in apparently impermissible contributions to four (4) Federal candidate committees made after the date of the election on Schedule B, supporting Line 23 (Images 202006179239804047-55).

On July 8, 2020, an RFAI was sent to the Committee referencing the 2020 June Monthly Report. Among other items, the RFAI requested clarification regarding the disbursement of apparently impermissible contributions. A chart was included with the

RFAI identifying the apparently impermissible contributions made to four (4)¹ Federal candidate committees after the date of the election (Images 202007080300075739-42).

On October 15, 2020, the Committee filed an Amended 2020 June Monthly Report which adequately resolved one (1) of the apparently impermissible contributions identified in the July 8, 2020 RFAI. Among other changes, Schedule B, supporting Line 23 disclosed a change in election designation for one of the contributions from the 2020 Primary election to the 2020 General election (Image 202010159294213907).

2020 July Monthly Report

On July 15, 2020, the Committee filed the 2020 July Monthly Report, covering the period from June 1, 2020 through June 30, 2020. The report disclosed \$20,000.00 in apparently impermissible contributions to four (4) Federal candidate committees made after the date of the election on Schedule B, supporting Line 23 (Images 202007159244661882-90).

On August 5, 2020, an RFAI was sent to the Committee referencing the 2020 July Monthly Report. The RFAI requested clarification regarding the disbursement of apparently impermissible contributions. A chart was included with the RFAI identifying the apparently impermissible contributions made to four (4)² Federal candidate committees after the date of the election (Images 202008050300081716-18).

On September 16, 2020, the Reports Analysis Division (RAD) Analyst attempted to reach Lisa Maloy, the Committee's Treasurer, to discuss the RFAs sent referencing the Committee's 2020 April Monthly, 2020 May Monthly, 2020 June Monthly, and 2020 July Monthly Reports. Ms. Maloy was unavailable, and the RAD Analyst left a message explaining that the outstanding matters referenced in the RFAs may be referred to another Commission office for potential further action. The RAD Analyst requested a return phone call to further discuss the matter (Attachment 3).

On the same day, Ms. Maloy called the RAD Analyst to discuss the outstanding matters. Ms. Maloy explained that she had not received the RFAs. The RAD Analyst explained that the RFAs were sent to the Committee's email address of record listed on the Committee's Statement of Organization ("FEC Form 1"). Ms. Maloy stated that she did not have access to the email address listed on the Committee's FEC Form 1. The RAD Analyst advised her to file an amended FEC Form 1 to disclose an updated email address

¹ The RFAI questioned four (4) impermissible contributions; however, one (1) of these contributions was improperly disclosed as a Primary election contribution instead of a General election contribution. On October 15, 2020, the Committee filed an Amended June Monthly Report correcting the clerical error and updating the election designation for one (1) of the apparently impermissible contributions.

² The RFAI questioned four (4) impermissible contributions; however, one (1) of these contributions was improperly disclosed as a Primary election contribution instead of a General election contribution. On October 15, 2020, the Committee filed an Amended July Monthly Report correcting the clerical error and updating the election designation for one (1) of the apparently impermissible contributions.

and directed her to the FEC website to view the RFAIs referencing the Committee's 2020 April Monthly, 2020 May Monthly, 2020 June Monthly, and 2020 July Monthly Reports (Attachment 3).

On September 17, 2020, Judy Erikson, a representative of the Committee, called to discuss the outstanding matters noted in the RFAIs. Ms. Erikson explained that she was not aware of the 2020 Congressional Primary election dates and wanted to redesignate the contributions to the 2020 General election. The RAD Analyst explained that the timeframe for corrective action had passed and that the Committee must request a refund. The RAD Analyst advised her to file an FEC Form 99 (Miscellaneous Electronic Submission) detailing the contribution refund requests to the Federal candidate committees once she has done so (Attachment 3).

Later on the same date, Ms. Erikson called the RAD Analyst with questions about what information to include in the FEC Form 99. The RAD Analyst explained that the Committee should provide the date and method of the corrective action for the public record. The RAD Analyst further explained that any information provided on the public record via an FEC Form 99 would be taken into consideration (Attachment 3).

On September 21, 2020, the Committee filed an FEC Form 99 detailing the refund requests for eight (8) of the apparently impermissible contributions to Federal candidate committees, totaling \$40,000.00 (Images 202009219276606400-04).

On September 24, 2020, the RAD Analyst returned a call from Ms. Erikson to discuss the Committee's election designations. Ms. Erikson explained that one of the contributions in question was reported by the recipient committee as a 2020 General contribution and asked if she could amend the Committee's report to change the election designation. Ms. Erikson also explained that the Committee may have inaccurately disclosed the election designation of a contribution. The Analyst explained that the Committee should only amend the report to rectify any inaccurate reporting on the Committee's part and that contributions on the report should accurately reflect the election designation that the Committee specified (Attachment 3).

On October 15, 2020, the Committee filed an Amended 2020 July Monthly Report which adequately resolved one (1) of the apparent impermissible contributions identified in the August 5, 2020 RFAI. Among other changes, Schedule B, supporting Line 23 disclosed a change in election designation for one of the contributions from the 2020 Primary election to the 2020 General election (Image 202010159294214059).

2020 October Monthly Report

On October 16, 2020, the Committee filed the 2020 October Monthly Report covering the period of September 1, 2020 through September 30, 2020. The report's Schedule A, supporting Line 16 (Refunds of Contributions Made to Federal Candidates and Other Political Committees) disclosed one (1) refund, totaling \$5,000.00, of an

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apparently impermissible contribution to a Federal candidate committee, received outside of the permissible timeframe (Image 202010169296947572).

2020 12-Day Pre-General Report

On October 21, 2020, the Committee filed the 2020 12-Day Pre-General Report, covering the period of October 1, 2020 through October 14, 2020. The report's Schedule A, supporting Line 16 disclosed four (4) refunds of apparent impermissible contributions, totaling \$20,000.00, received outside of the permissible timeframe (Images 202010219326738706-07).

2020 30-Day Post-General Report

On December 1, 2020, the Committee filed the 2020 30-Day Post-General Report, covering the period of October 15, 2020 through November 23, 2020. The report's Schedule A, supporting Line 16 disclosed two (2) refunds of apparent impermissible contributions, totaling \$10,000.00, received outside of the permissible timeframe (Image 202012019337233993).

To date, no further communications have been received from the Committee regarding this matter.

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O-Index (2021-2022)															
Cmte. ID: C00110338				Cmte. Name: AMERICAN CRYSTAL SUGAR COMPANY POLITICAL ACTION COMMITTEE											
Treasurer Name: MALOY, LISA				Address: 101 NORTH 3RD STREET, MOORHEAD, MN 56560-1990											
Cmte. Type: Q (QUALIFIED NON-PARTY)				Cmte. Designation: B (LOBBYIST/REGISTRANT PAC)				Filing Frequency: MONTHLY FILER							
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
F3XN	M2	N	2/18/2021	17	202102189428319407	1/1/2021	1/31/2021		\$1,427,448	\$26,879	\$30,275	\$1,424,052	-	-	\$0
F3XN	M3	N	3/17/2021	50	202103179440554187	2/1/2021	2/28/2021		\$1,424,052	\$82,127	\$345	\$1,505,835	-	-	\$0
F3XN	M4	N	4/16/2021	591	202104169443780470	3/1/2021	3/31/2021		\$1,505,835	\$1,102,522	\$225,245	\$2,383,112	-	-	\$0
F3XN	M5	N	5/18/2021	51	202105189446933219	4/1/2021	4/30/2021		\$2,383,112	\$42,142	\$134,653	\$2,290,601	-	-	\$0
Totals										\$1,253,673	\$390,519				

O-Index (2019-2020)															
Cmte. ID: C00110338				Cmte. Name: AMERICAN CRYSTAL SUGAR COMPANY POLITICAL ACTION COMMITTEE											
Treasurer Name: MALOY, LISA				Address: 101 NORTH 3RD STREET, MOORHEAD, MN 56560-1990											
Cmte. Type: Q (QUALIFIED NON-PARTY)				Cmte. Designation: B (LOBBYIST/REGISTRANT PAC)				Filing Frequency: MONTHLY FILER							
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			1/28/2019	6	201901280300255347	9/1/2018	9/30/2018		-	-	-	-	-	-	-
MS-T			9/17/2020	6	202009210300343559				-	-	-	-	-	-	-
MS-T			9/21/2020	5	202009219276606400				-	-	-	-	-	-	-
RQ2	M2	N	7/23/2019	3	201907230300042941	1/1/2019	1/31/2019	7/23/2019	-	-	-	-	-	-	-
RQ2	M10	N	10/31/2019	2	201910310300049993	9/1/2019	9/30/2019	10/31/2019	-	-	-	-	-	-	-
RQ2	M4	N	5/19/2020	3	202005190300071294	3/1/2020	3/31/2020	5/19/2020	-	-	-	-	-	-	-
RQ2	M5	N	6/3/2020	3	202006040300073669	4/1/2020	4/30/2020	6/3/2020	-	-	-	-	-	-	-
RQ2	M6	N	7/8/2020	4	202007080300075739	5/1/2020	5/31/2020	7/8/2020	-	-	-	-	-	-	-
RQ2	M7	N	8/5/2020	3	202008050300081716	6/1/2020	6/30/2020	8/5/2020	-	-	-	-	-	-	-
RQ2	M8	N	9/7/2020	2	202009070300085095	7/1/2020	7/31/2020	9/7/2020	-	-	-	-	-	-	-
F3XN	M2	N	2/19/2019	38	201902199145527520	1/1/2019	1/31/2019		\$1,816,488	\$35,440	\$207,716	\$1,644,213	-	-	\$0
F3XA	M2	A	7/31/2019	38	201907319161251870	1/1/2019	1/31/2019		\$1,816,488	\$35,440	\$207,716	\$1,644,213	-	-	\$0
F3XN	M3	N	3/20/2019	33	201903209145846746	2/1/2019	2/28/2019		\$1,644,213	\$15,364	\$280,255	\$1,379,322	-	-	\$0
F3XN	M4	N	4/17/2019	39	201904179146410361	3/1/2019	3/31/2019		\$1,379,322	\$35,057	\$92,743	\$1,321,636	-	-	\$0
F3XN	M5	N	5/20/2019	568	201905209149746834	4/1/2019	4/30/2019		\$1,321,636	\$1,100,497	\$132,864	\$2,289,269	-	-	\$0
F3XN	M6	N	6/20/2019	43	201906209150142920	5/1/2019	5/31/2019		\$2,289,269	\$33,336	\$120,252	\$2,202,354	-	-	\$0
F3XA	M6	A	9/25/2019	43	201909259163563572	5/1/2019	5/31/2019		\$2,289,269	\$31,294	\$120,252	\$2,200,311	-	-	\$0
F3XN	M7	N	7/16/2019	104	201907169151363339	6/1/2019	6/30/2019		\$2,202,354	\$38,803	\$263,486	\$1,977,670	-	-	\$0
F3XA	M7	A	11/6/2019	105	201911069165331017	6/1/2019	6/30/2019		\$2,200,311	\$35,706	\$263,486	\$1,972,531	-	-	\$0
F3XN	M8	N	8/14/2019	63	201908149162869116	7/1/2019	7/31/2019		\$1,977,670	\$37,010	\$52,219	\$1,962,461	-	-	\$0
F3XA	M8	A	11/6/2019	64	201911069165331127	7/1/2019	7/31/2019		\$1,972,531	\$32,951	\$52,219	\$1,953,262	-	-	\$0
F3XN	M9	N	9/19/2019	39	201909199163419493	8/1/2019	8/31/2019		\$1,962,461	\$15,431	\$57,788	\$1,920,104	-	-	\$0
F3XA	M9	A	11/6/2019	40	201911069165331191	8/1/2019	8/31/2019		\$1,953,262	\$15,431	\$57,788	\$1,910,905	-	-	\$0
F3XN	M10	N	10/16/2019	43	201910169164978617	9/1/2019	9/30/2019		\$1,910,905	\$24,432	\$104,217	\$1,831,120	-	-	\$0
F3XA	M10	A	11/6/2019	43	201911069165331236	9/1/2019	9/30/2019		\$1,910,905	\$24,432	\$104,217	\$1,831,120	-	-	\$0
F3XN	M11	N	11/18/2019	66	201911189165518157	10/1/2019	10/31/2019		\$1,831,120	\$60,218	\$80,224	\$1,811,114	-	-	\$0
F3XN	M12	N	12/19/2019	48	201912199166402670	11/1/2019	11/30/2019		\$1,811,114	\$35,015	\$67,742	\$1,778,387	-	-	\$0
F3XN	YE	N	1/16/2020	53	202001169167190982	12/1/2019	12/31/2019		\$1,778,387	\$43,942	\$95,225	\$1,727,104	-	-	\$0
F3XN	M2	N	2/18/2020	32	202002189186511680	1/1/2020	1/31/2020		\$1,727,104	\$24,727	\$145,240	\$1,606,590	-	-	\$0
F3XA	M2	A	10/15/2020	33	202010159294203986	1/1/2020	1/31/2020		\$1,727,104	\$24,743	\$145,240	\$1,606,607	-	-	\$0
F3XN	M3	N	3/17/2020	71	202003179203837717	2/1/2020	2/29/2020		\$1,606,590	\$78,361	\$313,764	\$1,371,187	-	-	\$0
F3XA	M3	A	10/15/2020	72	202010159294207163	2/1/2020	2/29/2020		\$1,606,607	\$78,389	\$313,764	\$1,371,232	-	-	\$0
F3XN	M4	N	4/16/2020	473	202004169219664616	3/1/2020	3/31/2020		\$1,371,187	\$902,599	\$150,241	\$2,123,546	-	-	\$0

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F3XA	M4	A	10/15/2020	474	202010159294209053	3/1/2020	3/31/2020		\$1,371,232	\$900,762	\$150,241	\$2,121,753	-	-	\$0
F3XN	M5	N	5/19/2020	125	202005199232802337	4/1/2020	4/30/2020		\$2,123,546	\$207,530	\$66,295	\$2,264,781	-	-	\$0
F3XA	M5	A	10/15/2020	126	202010159294213711	4/1/2020	4/30/2020		\$2,121,753	\$207,530	\$66,295	\$2,262,989	-	-	\$0
F3XN	M6	N	6/17/2020	62	202006179239803996	5/1/2020	5/31/2020		\$2,264,781	\$55,956	\$210,341	\$2,110,397	-	-	\$0
F3XA	M6	A	9/21/2020	63	202009219276606321	5/1/2020	5/31/2020		\$2,262,989	\$55,956	\$210,341	\$2,108,604	-	-	\$0
F3XA	M6	A	10/15/2020	63	202010159294213849	5/1/2020	5/31/2020		\$2,262,989	\$55,956	\$210,341	\$2,108,604	-	-	\$0
F3XN	M7	N	7/15/2020	49	202007159244661848	6/1/2020	6/30/2020		\$2,110,397	\$13,293	\$273,602	\$1,850,088	-	-	\$0
F3XA	M7	A	9/17/2020	50	202009179267221880	6/1/2020	6/30/2020		\$2,108,604	\$13,293	\$273,602	\$1,848,295	-	-	\$0
F3XA	M7	A	10/15/2020	50	202010159294214016	6/1/2020	6/30/2020		\$2,108,604	\$13,293	\$273,602	\$1,848,295	-	-	\$0
F3XN	M8	N	8/19/2020	76	202008199261393800	7/1/2020	7/31/2020		\$1,848,295	\$50,350	\$111,014	\$1,787,631	-	-	\$0
F3XN	M9	N	9/16/2020	41	202009169267204672	8/1/2020	8/31/2020		\$1,787,631	\$23,059	\$75,261	\$1,735,429	-	-	\$0
F3XA	M9	A	10/13/2020	42	202010139285499632	8/1/2020	8/31/2020		\$1,787,631	\$23,059	\$75,261	\$1,735,429	-	-	\$0
F3XN	M10	N	10/16/2020	47	202010169296947540	9/1/2020	9/30/2020		\$1,735,429	\$23,455	\$190,232	\$1,568,652	-	-	\$0
F3XN	12G	N	10/21/2020	47	202010219326738679	10/1/2020	10/14/2020		\$1,568,652	\$22,574	\$240,230	\$1,350,995	-	-	\$0
F3XN	30G	N	12/1/2020	88	202012019337233912	10/15/2020	11/23/2020		\$1,350,995	\$120,184	\$60,250	\$1,410,929	-	-	\$0
F3XN	YE	N	1/14/2021	39	202101149398672927	11/24/2020	12/31/2020		\$1,410,929	\$26,763	\$10,244	\$1,427,448	-	-	\$0
F1A		A	9/18/2020	4	202009189267238318				-	-	-	-	-	-	-
Totals										\$3,012,417	\$3,401,457				

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Cmte. ID: C00110338 Cmte. Name: AMERICAN CRYSTAL SUGAR COMPANY POLITICAL ACTION COMMITTEE															
Treasurer Name: MALOY, LISA Address: 101 NORTH 3RD STREET, MOORHEAD, MN 56560-1990															
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: MONTHLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
RQ2	M3	N	6/19/2017	3	201706190300087398	2/1/2017	2/28/2017	6/19/2017	-	-	-	-	-	-	-
RQ2	M10	N	11/29/2018	3	201811290300026042	9/1/2018	9/30/2018	11/29/2018	-	-	-	-	-	-	-
F3XN	M2	N	2/9/2017	32	201702099047595060	1/1/2017	1/31/2017		\$1,746,324	\$56,122	\$171,219	\$1,631,228	-	-	\$0
F3XA	M2	A	2/22/2017	32	201702229050497691	1/1/2017	1/31/2017		\$1,746,324	\$56,122	\$171,219	\$1,631,228	-	-	\$0
F3XA	M2	A	3/21/2017	32	201703219050967010	1/1/2017	1/31/2017		\$1,746,324	\$56,122	\$171,219	\$1,631,228	-	-	\$0
F3XN	M3	N	3/20/2017	50	201703209050907335	2/1/2017	2/28/2017		\$1,631,228	\$79,429	\$190,257	\$1,520,400	-	-	\$0
F3XA	M3	A	6/20/2017	50	201706209063522510	2/1/2017	2/28/2017		\$1,631,228	\$79,429	\$190,257	\$1,520,400	-	-	\$0
F3XA	M3	A	1/9/2018	50	201801099090381140	2/1/2017	2/28/2017		\$1,631,228	\$79,429	\$190,257	\$1,520,400	-	-	\$0
F3XN	M4	N	4/11/2017	521	201704119052070427	3/1/2017	3/31/2017		\$1,520,400	\$982,568	\$150,247	\$2,352,720	-	-	\$0
F3XA	M4	A	4/18/2017	521	201704189052306742	3/1/2017	3/31/2017		\$1,520,400	\$982,568	\$150,247	\$2,352,720	-	-	\$0
F3XN	M5	N	5/18/2017	52	201705189054010558	4/1/2017	4/30/2017		\$2,352,720	\$89,428	\$95,737	\$2,346,412	-	-	\$0
F3XN	M6	N	6/19/2017	33	201706199058920692	5/1/2017	5/31/2017		\$2,346,412	\$35,838	\$63,733	\$2,318,517	-	-	\$0
F3XN	M7	N	7/14/2017	47	201707149066625334	6/1/2017	6/30/2017		\$2,318,517	\$21,008	\$280,220	\$2,059,305	-	-	\$0
F3XN	M8	N	8/17/2017	30	201708179070381579	7/1/2017	7/31/2017		\$2,059,305	\$15,685	\$51,722	\$2,023,268	-	-	\$0
F3XN	M9	N	9/18/2017	30	201709189074744139	8/1/2017	8/31/2017		\$2,023,268	\$19,062	\$12,722	\$2,029,607	-	-	\$0
F3XN	M10	N	10/19/2017	42	201710199075807108	9/1/2017	9/30/2017		\$2,029,607	\$39,888	\$126,728	\$1,942,766	-	-	\$0
F3XN	M11	N	11/16/2017	48	201711169086682513	10/1/2017	10/31/2017		\$1,942,766	\$63,628	\$55,222	\$1,951,172	-	-	\$0
F3XN	M12	N	12/14/2017	74	201712149089194473	11/1/2017	11/30/2017		\$1,951,172	\$96,438	\$82,790	\$1,964,820	-	-	\$0
F3XA	M12	A	1/9/2018	73	201801099090380696	11/1/2017	11/30/2017		\$1,951,172	\$96,438	\$87,790	\$1,959,820	-	-	\$0
F3XN	YE	N	1/11/2018	49	201801119090395623	12/1/2017	12/31/2017		\$1,959,820	\$29,512	\$100,265	\$1,889,067	-	-	\$0
F3XN	M2	N	2/16/2018	48	201802169094574573	1/1/2018	1/31/2018		\$1,889,067	\$50,524	\$386,740	\$1,552,851	-	-	\$0
F3XN	M3	N	3/15/2018	42	201803159096559551	2/1/2018	2/28/2018		\$1,552,851	\$61,286	\$135,240	\$1,478,897	-	-	\$0
F3XN	M4	N	4/16/2018	35	201804169108262546	3/1/2018	3/31/2018		\$1,478,897	\$40,824	\$133,585	\$1,386,135	-	-	\$0
F3XN	M5	N	5/14/2018	602	201805149112028770	4/1/2018	4/30/2018		\$1,386,135	\$1,113,805	\$86,951	\$2,412,989	-	-	\$0
F3XN	M6	N	6/14/2018	33	201806149113685101	5/1/2018	5/31/2018		\$2,412,989	\$26,495	\$95,267	\$2,344,217	-	-	\$0

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F3XN	M7	N	7/12/2018	49	201807129115381430	6/1/2018	6/30/2018		\$2,344,217	\$35,603	\$217,727	\$2,162,093	-	-	\$0
F3XN	M8	N	8/15/2018	34	201808159119620193	7/1/2018	7/31/2018		\$2,162,093	\$23,399	\$52,737	\$2,132,756	-	-	\$0
F3XN	M9	N	9/19/2018	47	201809199121963763	8/1/2018	8/31/2018		\$2,132,756	\$45,500	\$45,234	\$2,133,022	-	-	\$0
F3XN	M10	N	10/17/2018	68	201810179125573143	9/1/2018	9/30/2018		\$2,133,022	\$38,993	\$340,224	\$1,831,791	-	-	\$0
F3XA	M10	A	12/12/2018	68	201812129142294022	9/1/2018	9/30/2018		\$2,133,022	\$38,993	\$340,224	\$1,831,791	-	-	\$0
F3XN	12G	N	10/24/2018	47	201810249130823836	10/1/2018	10/17/2018		\$1,831,791	\$23,890	\$152,727	\$1,702,953	-	-	\$0
F3XN	30G	N	12/4/2018	105	201812049133929728	10/18/2018	11/26/2018		\$1,702,953	\$102,595	\$50,267	\$1,755,281	-	-	\$0
F3XN	YE	N	1/9/2019	58	201901099143773691	11/27/2018	12/31/2018		\$1,755,281	\$76,473	\$15,266	\$1,816,488	-	-	\$0
Totals										\$3,168,003	\$3,097,839				

American Crystal Sugar Company Political Action Committee (C00110338)

Apparent Impermissible Contributions Not Remedied and/or Remedied Outside Permissible Timeframes

Untimely Resolved/Unresolved Apparently Impermissible Contributions

Name	Date	Amount	Election	Election (State-Date)	Report	Impermissible Amount Not Remedied within Timeframe	Remedied # Days Since Disbursement
Bishop for Congress	3/10/2020	\$5,000.00	P2020	NC-3/3/2020	2020 April Monthly		
Bishop for Congress	10/1/2020	-\$5,000.00	P2020	NC-3/3/2020	2020 12-Day Pre-General	\$5,000.00	205
Hudson for Congress	3/10/2020	\$5,000.00	P2020	NC-3/3/2020	2020 April Monthly	\$5,000.00	
Deborah Ross for Congress	4/9/2020	\$5,000.00	P2020	NC-3/3/2020	2020 May Monthly		
Deborah Ross for Congress	10/1/2020	-\$5,000.00	P2020	NC-3/3/2020	2020 12-Day Pre-General	\$5,000.00	175
Kathy Manning for Congress	5/13/2020	\$5,000.00	P2020	NC-3/3/2020	2020 June Monthly		
Kathy Manning for Congress	9/29/2020	-\$5,000.00	P2020	NC-3/3/2020	2020 October Monthly	\$5,000.00	139
Castro for Congress	5/20/2020	\$5,000.00	P2020	TX-3/3/2020	2020 June Monthly		
Castro for Congress	10/5/2020	-\$5,000.00	P2020	TX-3/3/2020	2020 12-Day Pre-General	\$5,000.00	138
Sheila Jackson Lee for Congress	5/29/2020	\$5,000.00	P2020	TX-3/3/2020	2020 June Monthly		
Sheila Jackson Lee for Congress	10/5/2020	-\$5,000.00	P2020	TX-3/3/2020	2020 12-Day Pre-General	\$5,000.00	129
Pete Sessions for Congress	6/16/2020	\$5,000.00	P2020	TX-3/3/2020	2020 July Monthly		
Pete Sessions for Congress	10/19/2020	-\$5,000.00	P2020	TX-3/3/2020	2020 30-Day Post-General	\$5,000.00	125
Gina Ortiz Jones for Congress	6/18/2020	\$5,000.00	P2020	TX-3/3/2020	2020 July Monthly		
Gina Ortiz Jones for Congress	10/19/2020	-\$5,000.00	P2020	TX-3/3/2020	2020 30-Day Post-General	\$5,000.00	123
August Pfluger for Congress	6/23/2020	\$5,000.00	P2020	TX-3/3/2020	2020 July Monthly	\$5,000.00	
Total Impermissible Amount Not Remedied Within Timeframe						\$45,000.00	

Breakdown of Apparent Remedied and Unremedied Impermissible Contributions

Total Amount Remedied Outside of the Permissible Timeframe (all reports):	\$35,000.00
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Total Amount Unremedied (all reports):	\$10,000.00
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Total Amount Not Remedied within the Permissible Timeframe (all reports):	\$45,000.00
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