

**20L-27**

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: November 23, 2020 (revised March 11, 2021)

ANALYST: Jeremiah Hempel

- I. COMMITTEE: Rural Freedom Network  
C00647966  
Sherwood Guernsey, Treasurer  
135 Bridge St.  
Schoharie, NY 12157
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(g)(2)  
11 CFR § 104.4(b)(2)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 48-Hour Reports)**

Rural Freedom Network (“the Committee”) failed to timely file one (1) 48-Hour Report totaling \$45,518.00 supporting two (2) independent expenditures disclosed on the 2020 July Quarterly Report, made up to and including the 20<sup>th</sup> day before the 2020 General Election held in the state of Maine (Attachment 2).

On July 11, 2020, the Committee filed one (1) 48-Hour Report to support three (3) independent expenditures totaling \$55,518.00 disseminated on May 21, 2020 and July 1, 2020 (Images 202007119244429579-82). The Committee attached memo texts to its 48-Hour Report stating, “Ads began running on May 21, 2020, incremental [sic] spending reached \$10,000 on June 6, 2020” and “Ads began running on July 1, 2020, incremental [sic] spending has not yet reached \$10,000 as of July 10, 2020” (Images 202007119244429580 and 202007119244429582).

On July 13, 2020, the Committee filed its 2020 July Quarterly Report covering the period from April 1, 2020, through June 30, 2020. The report included a Schedule E (Itemized Independent Expenditures) disclosing three (3) independent expenditures

totaling \$55,518.00, made in opposition to one (1) Federal candidate (Images 202007139244501163-66). The Committee attached memo texts to its report stating, “Ads began running on May 21, 2020, incremental [sic] spending reached \$10,000 on June 6, 2020” and “Ads began running on May 21, 2020, incremental [sic] spending reached \$10,000 on June 6, 2020” (Images 202007139244501164 and 202007139244501166).

On August 18, 2020, a Request for Additional Information (RAI) was sent to the Committee referencing the 2020 July Quarterly Report. The RAI noted that the Committee may have failed to timely file one (1) or more of the required 48-Hour Reports regarding independent expenditures. A chart was included with the RAI identifying the independent expenditures for which a 48-Hour Report had not been timely filed (Images 202008180300083079-81, Attachment 2).

On September 14, 2020, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission). The Committee stated, in full:

“This submission responds to the Commission's letter of September 22, 2020, regarding the committee's 2020 July Quarterly Report [sic]. The committee acknowledges that it failed to timely file a 48 hour notice with respect to certain independent [sic] expenditures made by the committee. This error was caused by an internal miscommunication and was discovered during the preparation [sic] of the committee's [sic] quarterly report. Upon discovery of the error, the committee [sic] immediately filed the 48 hour report. The committee has taken internal steps to ensure this oversight does not happen in the future” (Image 202009149267166715).

On September 28, 2020 and November 13, 2020, the Reports Analysis Division (RAD) Analyst emailed Sherwood Guernsey, the Committee's Treasurer, and requested a return phone call to discuss the potentially referable issues disclosed in the 2020 July Quarterly Report (Attachment 3).

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

O-Index (2019-2020)															
Cmte. ID: C00647966 Cmte. Name: RURAL FREEDOM NETWORK															
Treasurer Name: GUERNSEY, SHERWOOD Address: 135 BRIDGE ST, SCHOHARIE, NY 12157															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			9/14/2020	1	202009149267166715				-	-	-	-	-	-	-
RQ2	Q2	N	8/18/2020	3	202008180300083079	4/1/2020	6/30/2020	8/18/2020	-	-	-	-	-	-	-
F3XN	MY	N	7/17/2019	7	201907179151398355	1/1/2019	6/30/2019		\$135	\$500	\$501	\$134	-	-	\$0
F3XN	YE	N	1/19/2020	18	202001199167272459	7/1/2019	12/31/2019		\$134	\$26,960	\$909	\$26,184	-	-	\$0
F3XN	Q1	N	4/15/2020	9	202004159216796251	1/1/2020	3/31/2020		\$26,184	\$24,225	\$1,626	\$48,782	-	-	\$0
F3XN	Q2	N	7/13/2020	10	202007139244501157	4/1/2020	6/30/2020		\$48,782	\$10,570	\$55,546	\$3,805	-	-	\$0
F3XN	Q3	N	10/8/2020	7	202010089285066387	7/1/2020	9/30/2020		\$3,805	\$775	\$579	\$4,001	-	-	\$0
F1A		A	7/8/2019	4	201907089150454590				-	-	-	-	-	-	-
F24N	48		7/11/2020	4	202007119244429579				-	-	-	-	-	-	-
F1A		A	7/3/2019	4	201907039150448521				-	-	-	-	-	-	-
F24N	24		10/26/2020	2	202010269336587948				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$63,030</b>	<b>\$59,164</b>				

O-Index (2017-2018)															
Cmte. ID: C00647966 Cmte. Name: RURAL FREEDOM NETWORK															
Treasurer Name: GUERNSEY, SHERWOOD Address: 135 BRIDGE ST, SCHOHARIE, NY 12157															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			4/6/2018	1	201804069104788404				-	-	-	-	-	-	-
F3XN	MY	N	7/24/2017	8	201707249069800753	1/1/2017	6/30/2017		\$0	\$6,405	\$207	\$6,197	-	-	\$0
F3XN	YE	N	1/25/2018	16	201801259090638478	7/1/2017	12/31/2017		\$6,197	\$22,980	\$1,497	\$27,680	-	-	\$0
F3XN	Q1	N	4/11/2018	13	201804119106282506	1/1/2018	3/31/2018		\$27,680	\$35,040	\$31,264	\$31,455	-	-	\$0
F3XN	Q2	N	7/9/2018	11	201807099115258569	4/1/2018	6/30/2018		\$31,455	\$8,320	\$37,558	\$2,217	-	-	\$0
F3XN	Q3	N	10/10/2018	10	201810109124449846	7/1/2018	9/30/2018		\$2,217	\$8,090	\$5,738	\$4,569	-	-	\$0
F3XN	12G	N	10/22/2018	12	201810229130592552	10/1/2018	10/17/2018		\$4,569	\$5,540	\$5,148	\$4,960	-	-	\$0
F3XN	30G	N	11/30/2018	13	201811309133886146	10/18/2018	11/26/2018		\$4,960	\$22,429	\$27,085	\$303	-	-	\$0
F3XN	YE	N	1/10/2019	6	201901109143783452	11/27/2018	12/31/2018		\$303	\$0	\$167	\$135	-	-	\$0
F24N	24		10/26/2018	1	201810269133542103				-	-	-	-	-	-	-
F1A		A	12/6/2017	4	201712069089121418				-	-	-	-	-	-	-
F24N	48		5/1/2018	3	201805019111744441				-	-	-	-	-	-	-
F1N		N	6/16/2017	4	201706169056535303				-	-	-	-	-	-	-
F24N	24		10/19/2018	1	201810199125775654				-	-	-	-	-	-	-
<b>Totals</b>										<b>\$108,804</b>	<b>\$108,668</b>				

O-Index (2015-2016)															
Cmte. ID: C00647966 Cmte. Name: RURAL FREEDOM NETWORK															
Treasurer Name: GUERNSEY, SHERWOOD Address: 135 BRIDGE ST, SCHOHARIE, NY 12157															
Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
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No records were found for this cycle.

**Rural Freedom Network (C00647966)**

2020 July Quarterly Report

48-Hour Report Not Timely Filed

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Opposed</b>	<b>Election</b>	<b>48-Hour Report Filed</b>
Ben Hillman & Company	5/21/2020	\$518.00	Susan M. Collins	2020 General	7/11/2020
Frame Media Strategies LLC	5/21/2020	\$45,000.00 <i>48-Hour Report Required</i>	Susan M. Collins	2020 General	7/11/2020