



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1634

DATE SCANNED 10/26/07

SCANNER NO. 2

SCAN OPERATOR JAD

27092613209



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

COMMISSION
SECRETARIAT

2007 APR -5 A 9:36

April 4, 2007

MEMORANDUM

SENSITIVE

27092613210

TO: THE COMMISSION

THROUGH: PATRINA M. CLARK
STAFF DIRECTOR *PMC*

MARGARITA MAISONET *gml*
CHIEF COMPLIANCE OFFICER

FROM: JOHN D. GIBSON *gml*
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REASON TO BELIEVE RECOMMENDATION - 2006 12 DAY
PRE-GENERAL (QUARTERLY FILERS) AND 30 DAY POST-
GENERAL REPORT FOR THE ADMINISTRATIVE FINE
PROGRAM

Attached are two lists of political committees and their treasurers who failed to file or timely file the 2006 12 Day Pre-General and/or the 2004 30 Day Post-General Reports in accordance with 2 U.S.C. 434(a). The 12 Day Pre-General list is comprised of unauthorized committees filing quarterly that made general election contributions or expenditures from October 1, 2006 through October 18, 2006. The 30 Day Post-General list is comprised of authorized committees whose candidates sought election in the November 7th General Election, as well as unauthorized committees filing either quarterly or monthly.

The 12 Day Pre-General Report was due on October 26, 2006 and should cover the reporting period from October 1, 2006 through October 18, 2006. The 30 Day Post-General Report was due on December 7, 2006 and should cover the reporting period from October 19, 2006 to November 27, 2006 or from October 1, 2006 through November 27, 2006, if the 12 Day Pre-General Report was not required.

The committees appearing on the 12 Day Pre-General Report list either filed late or failed to file the report prior to four (4) days before the General Election (considered a non-filed report). The committees appearing on the 30 Day Post-General Report list either failed to file the report, filed the report more than five (5) days after the due date or

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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 included on the attached lists.

As noted above, the 12 Day Pre-General Report circulation list includes unauthorized committees filing quarterly that failed to file or failed to timely file the 12 Day Pre-General Report. Unlike unauthorized committees that file on a monthly basis, a quarterly filer need only file this report if it made general election contributions or expenditures between the dates of October 1, 2006 and October 18, 2006. In order to accurately identify the committees for administrative fines purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12 Day Pre-General Report (12 Day Report) submitted by an unauthorized quarterly filer was reviewed to ensure that it disclosed general election contributions or expenditures made during the coverage dates of the report. Any report meeting this definition that was filed late is included in the list. Any report not disclosing general election contributions or expenditures during this period is not included in the list, as it is not a required filing.
- Every 30 Day Post-General Report (30 Day Report) submitted by an unauthorized quarterly filer that covered the period from October 1, 2006 through November 27, 2006 (58 days), was reviewed for activity which would have required the filing of a 12 Day Pre-General Report. If our research indicated that the filing of a 12 Day Report was required, we utilized a two-step method to arrive at the estimated level of activity on which to base the fine amount. First, 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 31% (18 days (12G Filing Period)/58 days (30G Filing Period)).
- If the same committee also failed to file the 30 Day Report in a timely manner, we based the 30 Day Report fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the estimated level of activity for the 12 Day Report from the total amount of activity on the 30 Day Report. In these cases, the committees will appear on both lists and will be assessed a fine for both the 12 Day and 30 Day Reports based on the estimated levels of activity described above.

Recommendation

1. Find reason to believe that the political committees and their treasurers listed on the RTB Circulation Reports violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Reports.
2. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2006 PRE-GENERAL Election Sensitive 10/26/2006 UNAUTH_Q

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1604	C00169508	AAI CORPORATION POLITICAL ACTION COMMITTEE	RICHARD F. CHRIST	\$196,951	1	11/5/2006	Not Filed	\$7,500	\$750
1605	C00366385	ADVANCED ACOUSTIC CONCEPTS INC POLITICAL ACTION COMMITTEE	SCOTT WILLIAMS	\$203,094	0	12/8/2006	Not Filed	\$3,599	\$500
1606	C00340356	ADVANCED MEDICAL TECHNOLOGY ASSOCIATION POLITICAL ACTION COMMITTEE	KENNETH MENDEZ	\$413,835	0	11/2/2006	7	\$2,000	\$120
1607	C00141242	AGRI-MARK INC LEGISLATIVE AND EDUCATIONAL COMMITTEE (ALEC)	HAROLD LARRABEE	\$106,244	1	12/15/2006	Not Filed	\$2,000	\$625
1608	C00325159	AIRTRAN AIRWAYS INC POLITICAL ACTION COMMITTEE	STANLEY GADEK	\$143,814	0	1/15/2007	Not Filed	\$7,129	\$600
1609	C00352054	ARMENIAN AMERICAN PAC (ARMENPAC)	DR. SARKIS KECHEJIAN	\$281,080	0	12/3/2006	Not Filed	\$5,577	\$600
1610	C00363382	AVAYA INCORPORATED POLITICAL ACTION COMMITTEE	CHARLES E. CROWDERS	\$143,681	0	12/8/2006	Not Filed	\$3,350	\$500
1611	C00204388	BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC)	IRA LAMEL	\$189,003	2	11/2/2006	7	\$6,000	\$255
1612	C00078287	CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT	KAREN MELCHERT	\$345,872	0	12/12/2006	Not Filed	\$26,149	\$1,400

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1613	C00304832	CONSTELLATION BRANDS INC POLITICAL ACTION COMMITTEE	PERRY HUMPHREY	\$372,102	1	11/6/2006	Not Filed	\$7,554	\$750
1614	C00303818	COUNCIL FOR AFFORDABLE AND RURAL HOUSING PAC INC (CARH PAC)	TRAVIS A. MILLER	\$100,735	0	12/29/2006	Not Filed	\$1,457	\$500
1615	C00160630	DRUMMOND COMPANY, INC POLITICAL ACTION COMMITTEE (DPAC)	MR. SCOTT O. STANFIELD	\$128,650	0	11/1/2006	6	\$8,500	\$160
1616	C00135855	ENERGEN CORPORATION POLITICAL ACTION COMMITTEE F/K/A ALAGASCO INC PAC	MR. DUDLEY REYNOLDS	\$171,512	0	11/8/2006	Not Filed	\$13,000	\$900
1618	C00400242	FLORIDA FOR AMERICAS FUTURE PAC	HUGH WESTBROOK	\$112,600	0	12/6/2006	Not Filed	\$24,200	\$900
1619	C00349639	FLORIDA PBA INC FRIENDS OF LAW ENFORCEMENT	DAVID BRUCE MURRELL	\$112,445	0	12/7/2006	Not Filed	\$10,161	\$900
1620	C00012328	FLORIDA SUGAR CANE LEAGUE PAC	RYAN WESTON	\$385,029	0	12/6/2006	Not Filed	\$1,000	\$500
1621	C00242040	FOREST LANDOWNERS ASSOCIATION, INC., POLITICAL ACTION COMMITTEE	SCOTT JONES	\$145,222	0	12/21/2006	Not Filed	\$2,852	\$500
1622	C00297531	GOVERNMENT IS NOT GOD	NANCY M. MURRAY	\$133,277	0	11/8/2006	Not Filed	\$10,769	\$900
1623	C00338848	HOOSIER POLITICAL ACTION COMMITTEE (HOOSIER PAC)	GILEAD KAPEN	\$516,237	1	11/30/2006	Not Filed	\$37,000	\$1,750
1624	C00303073	INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC)	J. MICHAEL CRYE	\$317,704	0	12/7/2006	Not Filed	\$6,000	\$600

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1625	C00212142	KIRKLAND	STEPHEN TOMLINSON	\$208,482	0	12/5/2006	Not Filed	\$1,333	\$500
1626	C00284810	MARRIOTT INTERNATIONAL, INC. POLITICAL ACTION COMMITTEE	MS. MELISSA FROEHLICH	\$303,418	0	12/6/2007	Not Filed	\$31,748	\$1,400
1627	C00413575	MWW GROUP INC. POLITICAL ACTION COMMITTEE THE	SETH ROSENSTEIN	\$115,565	0	11/22/2006	Not Filed	\$5,305	\$600
1628	C00296657	OHIO FINANCIAL SERVICES POLITICAL ACTION COMMITTEE	MR. JOSEPH R. SANDER	\$127,643	0	11/6/2006	Not Filed	\$9,773	\$600
1629	C00383489	PUBLIC SERVICE ENTERPRISE GROUP INC. POLITICAL ACTION COMMITTEE (PEGPAC)	MR. MARK G. KAHRER	\$217,457	0	11/21/2006	Not Filed	\$13,068	\$900
1630	C00363812	RECREATIONAL FISHING ALLIANCE, PAC	SCHNELLER A. STACEY	\$156,919	0	12/8/2006	Not Filed	\$13,184	\$900
1631	C00407130	REHAB CARE GROUP INC. PAC	MARK ANTHONY BOGOVICH	\$129,589	0	12/7/2006	Not Filed	\$3,567	\$500
1632	C00345132	REPUBLICAN JEWISH COALITION-POLITICAL ACTION COMMITTEE (RJC-PAC)	MATTHEW BROOKS	\$304,333	0	12/8/2006	Not Filed	\$32,000	\$1,400
1633	C00368696	RESPONSIBILITY AND FREEDOM WORK PAC (REWFAC)	JOHN P. NAIL	\$105,727	0	1/12/2007	Not Filed	\$4,115	\$500
1634	C00411611	SECURE PAC	LONDON THOMPSON	\$101,961	0	12/7/2006	Not Filed	\$57,015	\$3,000
1635	C00402669	SI INTERNATIONAL INC. POLITICAL ACTION COMMITTEE	THOMAS E. DUNN	\$183,625	0	12/4/2006	Not Filed	\$6,370	\$600
1636	C00392621	SNOW PAC	STANLEY R. DE WAAL	\$534,667	0	12/8/2006	Not Filed	\$33,367	\$1,400

AF#	Committee ID	Committee Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1637	C00381459	SOCIETY FOR VASCULAR SURGERY POLITICAL ACTION COMMITTEE	REBECCA MARON	\$169,667	0	11/30/2006	Not Filed	\$2,351	\$500
1638	C00359984	SOUTHEAST MILK INC POLITICAL ACTION COMMITTEE	CHARLES GARRISON	\$101,623	0	12/7/2006	Not Filed	\$7,000	\$600
1639	C00417576	TERRIPAC UNITED ASSN	BRIAN SCHIAVO	\$115,452	1	11/1/2006	6	\$3,615	\$137
1640	C00173419	JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POL ED	JAMES REED	\$1,103,402	0	11/1/2006	6	\$24,696	\$210
1641	C00390575	WELLCARE HEALTH PLANS, INC PAC (WELLCARE PAC)	DAVID K SMITH	\$150,163	0	12/5/2006	Not Filed	\$17,500	\$900

Federal Election Commission
Reason to Believe Circulation Report
2006 POST-GENERAL Non Election Sensitive 12/07/2006 UNAUTH & AUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1642	C00325159	AIRTRAN AIRWAYS INC POLITICAL ACTION COMMITTEE		STANLEY GADEK	\$148,703	0	1/15/2007	Not Filed	\$4,889	\$250
1643	C00396028	AL GREEN FOR CONGRESS	GREEN, ALEXANDER	WILLIAM A LAWSON	\$747,829	3	1/7/2007	Not Filed	\$148,867	\$7,875
1644	C00416404	ARCH LEADERSHIP PAC		JOHN ROSS TRUMAN	\$133,843	0		Not Filed	\$48,281 (est)	\$900
1645	C00427617	BLUE AMERICA PAC		HOWARD KLEIN	\$110,155	0	1/23/2007	Not Filed	\$58,689	\$2,700
1646	C00174847	BREWERY SOFT DRINK BEER DISTR OPTICAL DENTAL MISC WORKERS WAREHOUSEMAN HELP LOCAL 830 PAC		DANIEL H. GRACE	\$360,351	1	1/5/2007	29	\$40,003	\$975
1647	C00423335	BYRNE FOR CONGRESS COMMITTEE THE	BYRNE, MARK	JILL K. HUEY	\$143,413	0	3/14/2007	Not Filed	\$36,327	\$900

1649	C00421693	CHRISTIAN BURRIDGE FOR CONGRESS	BURRIDGE, CHRISTIAN	DANIEL CLYDE CARR	\$130,908	0	2/2/2007	Not Filed	\$28,919	\$900
1650	C00415604	CITIZENS FOR ACTION		NANCY T. KANJORSKI	\$305,153	0	1/10/2007	Not Filed	\$40,281	\$900
1651	C00062224	GLOROX COMPANY EMPLOYEES' POLITICAL ACTION COMMITTEE THE		VICTORIA JONES	\$112,106	0	1/9/2007	Not Filed	\$4,438	\$250
1652	C00416321	COMMITTEE TO ELECT BRAD BLANTON	BLANTON, BRAD	JUSTIN BURCHARD	\$112,351	0		Not Filed	\$22,470 (est)	\$500
1653	C00426783	COMMITTEE TO ELECT RICK TRENT THE	TRENT, RICKY LYNN	LISA JO TRENT	\$157,095	0	12/13/2006	6	\$26,805	\$320
1654	C00394692	COMMITTEE TO ELECT WILLIAM (WILLIE) VADEN FOR CONGRESS	VADEN, WILLIAM ROSS	WILLIAM ROSS VADEN	\$244,212	1		Not Filed	\$27,135	\$1,125
1655	C00125534	COMPOSITION ROOFERS LOCAL UNION #30 POLITICAL ACTION & EDUCATION FUND		TOM PEDRICK	\$433,371	0	1/2/2007	26	\$62,963	\$2,250

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1656	C00111237	COMPRESSED AIR FREE AIR FOUNDATION TUNNEL CAISSON SUBWAY WORKERS POLITICAL ACTION FUND		RICHARD E. FITZSIMMONS	\$133,149	0	1/11/2007	Not Filed	\$28,574	\$900
1657	C00379834	CONTRA COSTA UNITED DEMOCRATIC CAMPAIGN AKA CCUDC		GREGORY E. SANBORN	\$139,379	1	2/28/2007	Not Filed	\$24,388	\$625
1658	C00387555	COUNCIL FOR A LIVABLE WORLD CANDIDATE FUND		JOHN D. ISAACS	\$516,010	0	12/13/2006	6	\$76,052	\$1,000
1659	C00303818	COUNCIL FOR AFFORDABLE AND RURAL HOUSING PAC INC. (CARH PAC)		TRAVIS A. MILLER	\$103,976	0	12/29/2006	22	\$3,243	\$135
1660	C00369801	DAVID SCOTT FOR CONGRESS	SCOTT, DAVID ALBERT	HANK AARON	\$2,595,854	0	12/16/2006	9	\$435,592	\$3,800
1661	C00242040	FOREST LANDOWNERS ASSOCIATION, INC. POLITICAL ACTION COMMITTEE		SCOTT JONES	\$151,570	0	12/21/2006	14	\$6,348	\$120
1663	C00131557	HEARTLAND PAC		DAVID B. ORLEAN	\$140,402	0	1/5/2007	29	\$63,249	\$2,475
1665	C00265603	KERN COUNTY REPUBLICAN CENTRAL COMMITTEE		CRAIG HENDERSON	\$590,830	1	12/19/2006	11	\$14,708	\$193
1666	C00428615	LAKE COUNTY DEMOCRATIC PARTY FEDERAL COMMITTEE		PETER A. COUVALL	\$585,876	0	1/4/2007	28	\$189,533	\$5,000
1667	C00420091	MAATTA FOR CONGRESS CAMPAIGN COMMITTEE	MAATTA, RANDAL G	DEBRA C. MAATTA	\$194,712	3		Not Filed	\$64,904 (est)	\$4,725
1668	C00003111	MAINE REPUBLICAN PARTY		PHILIP ROY, JR.	\$961,378	0	12/20/2006	13	\$26,507	\$460
1669	C00416131	MIDWEST VALUES PAC (MVP)		THOMAS BORMAN	\$2,194,927	0	11/1/2007	26	\$354,447	\$9,000
1670	C00424077	MIKE MCGRAW FOR CONGRESS	MCGRAW, MICHAEL EDWARD	A ROBERT MUZIO	\$131,898	0	1/29/2007	Not Filed	\$28,452	\$900
1671	C00174854	MONTANA CREDIT UNIONS LEAGUE POLITICAL ACTION COMMITTEE		JERRY W. GUSTAFSON	\$184,776	0	1/29/2007	Not Filed	\$6,396	\$300

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1673	C00369884	MZM INC. PAC		MS. JEANNE O'NEIL	\$178,705	0		Not Filed	\$35,741 (est)	\$900
1674	C00188987	NATIONAL ASSOCIATION FOR HOME CARE POLITICAL ACTION COMMITTEE		MICHAEL N. WOODS	\$137,626	2	1/11/2007	Not Filed	\$1,357	\$375
1675	C00012211	NORTH CAROLINA DENTAL PAC		AARON TROPMANN	\$124,000	0	1/6/2007	30	\$240	\$175
1676	C00416511	PENNSYLVANIA PAC FOR PROGRESS		JONATHAN ROBERT KING	\$149,370	0		Not Filed	\$37,679 (est)	\$900
1677	C00266536	PHILLIPS INTERNATIONAL INC POLITICAL ACTION COMMITTEE		MR. WILLIAM ESTEY	\$231,502	0		Not Filed	\$46,300 (est)	\$900

1679	C00368696	RESPONSIBILITY AND FREEDOM WORK PAC (REWPAC)		JOHN P. NAIL	\$141,142	0	1/16/2007	Not Filed	\$35,415	\$900
1680	C00409359	SAN MATEO COUNTY DEMOCRATIC CENTRAL COMMITTEE		JUDITH A. CHRISTENSEN	\$160,523	0		Not Filed	\$12,832 (est)	\$500
1681	C00278788	SUFF CO DETECTIVES ASSN INC POLITICAL ACTION COMMITTEE		RAYMOND L. GRIFFIN JR	\$150,036	0	1/12/2007	Not Filed	\$21,496	\$500

1683	C00178541	TEAMSTERS JOINT COUNCIL 53 POLITICAL ACTION COMMITTEE		PAUL CARBUCCO	\$288,780	0	1/12/2007	Not Filed	\$50,002	\$2,700
1684	C00009357	THE RECORDING INDUSTRY ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE		MITCH GLAZIER	\$323,689	0	12/14/2006	7	\$12,000	\$135
1685	C00414417	TOM BARLOW FOR CONGRESS '06	BARLOW, THOMAS J III	SHIRLEY J. BARLOW	\$240,749	0	12/14/2006	7	\$86,118	\$1,100

1687	C00173419	UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POLED		JAMES REED	\$1,178,532	0	12/29/2006	22	\$75,121	\$2,600
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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
1688	C00063586	UNITED STATES BEET SUGAR ASSOCIATION POLITICAL ACTION COMMITTEE		JAMES JOHNSON	\$154,516	0	1/25/2007	Not Filed	\$1,000	\$250
1690	C00421628	WEGNER FOR CONGRESS	WEGNER, KENNETH ALEXANDER	KENNETH WEGNER	\$192,120	1	3/28/2007	Not Filed	\$23,586	\$625
1691	C00419614	WILSON AURBACH FOR CONGRESS COMMITTEE	AURBACH, WILSON	JORDAN AURBACH	\$147,275	0	1/23/2007	Not Filed	\$8,065	\$300
1693	C00421131	ZANZI FOR CONGRESS	ZANZI, ITALO ANDRES	RYAN ADRIAN MOREIN	\$656,819	1	12/18/2006	11	\$109,643	\$2,468



FEDERAL ELECTION COMMISSION

Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: Thursday, April 5, 2007 11:00

BALLOT DEADLINE: Tuesday, April 10, 2007 4:00

COMMISSIONER: LENHARD, MASON, von SPAKOVSKY, WALTHER, WEINTRAUB

SUBJECT: RTB Recommendation – 2006 12 Day Pre-General
(Quarterly Filers) and 30 Day Post-General Report For
The Administrative Fine Program. Memorandum from the
Assistant Staff Director, Reports Analysis Division
dated April 4, 2007.

- () I approve the recommendation(s)
- () I object to the recommendation(s)
- () I approve the recommendations except those following
to which I object (please insert AF#)
-
- () I approve the recommendations except those following
in which I abstain (please insert AF#)
-
- () I approve the recommendations except those following
in which I am recused (please insert AF#)
-
- () I am not voting on this tally.

A definite vote is required. All ballots must be signed and dated. Please return
ONLY THE BALLOT to the Commission Secretary. Please return ballot no later
than date and time shown above.

DATE: _____

SIGNATURE: _____

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

27092615220

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 12)
Day Pre-General (Quarterly Filers) and 30)
Day Post-General Report For The)
Administrative Fine Program:)
ADVANCED MEDICAL TECHNOLOGY) AF# 1606
ASSOCIATION POLITICAL ACTION)
COMMITTEE, and Kenneth Mendez as)
treasurer;)
BI-COUNTY POLITICAL ACTION) AF# 1611
COMMITTEE (FKA SUFFOLK PAC), and)
IRA LAMEL as treasurer;)
DRUMMOND COMPANY INC.) AF# 1615
POLITICAL ACTION COMMITTEE)
(DPAC), and Stanfield, Scott O. Mr. as)
treasurer;)
TERRIPAC, and BRIAN SCHIAVO as) AF# 1639
treasurer;)
UNITED ASSN JOURNEYMEN &) AF# 1640
APPRENT OF PLUMB & PIPEFITTING)
IND LOCAL 322 COMM FOR POL ED,)
and JAMES REED as treasurer;)
COUNCIL FOR AFFORDABLE AND) AF# 1614
RURAL HOUSING PAC INC (CARH)
PAC), and TRAVIS A MILLER as)
treasurer;)
FLORIDA FOR AMERICAS FUTURE) AF# 1618
PAC, and HUGH WESTBROOK as)
treasurer;)
SECURE PAC, and LONDON) AF# 1634
THOMPSON as treasurer;)
AAI CORPORATION POLITICAL) AF# 1604
ACTION COMMITTEE, and RICHARD F)
CHRIST as treasurer;)
ADVANCED ACOUSTIC CONCEPTS) AF# 1605
INC POLITICAL ACTION COMMITTEE,)
and SCOTT WILLIAMS as treasurer;)

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Federal Election Commission
Certification for Administrative Fines
April 10, 2007

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AGRI-MARK, INC LEGISLATIVE AND) AF# 1607
EDUCATIONAL COMMITTEE (ALEC),)
and HAROLD LARRABEE as treasurer;)
AIRTRAN AIRWAYS INC POLITICAL) AF# 1608
ACTION COMMITTEE, and Gadek,)
Stanley as treasurer;)
ARMENIAN AMERICAN PAC) AF# 1609
(ARMENPAC), and Kechejian, Sarkis Dr.)
as treasurer;)
AVAYA INCORPORATED POLITICAL) AF# 1610
ACTION COMMITTEE, and Crowders,)
Charles E. as treasurer;)
CNA FINANCIAL CORPORATION) AF# 1612
CITIZENS FOR GOOD GOVERNMENT,)
and KAREN MELCHERT as treasurer;)
CONSTELLATION BRANDS INC) AF# 1613
POLITICAL ACTION COMMITTEE, and)
PERRY HUMPHREY as treasurer;)
ENERGEN CORPORATION POLITICAL) AF# 1616
ACTION COMMITTEE F/K/A)
ALAGASCO INC PAC, and DUDLEY C)
REYNOLDS as treasurer;)

FLORIDA PBA INC FRIENDS OF LAW) AF# 1619
ENFORCEMENT, and DAVID BRUCE)
MURRELL as treasurer;)
FLORIDA SUGAR CANE LEAGUE PAC,) AF# 1620
and Ryan Weston as treasurer;)
FOREST LANDOWNERS) AF# 1621
ASSOCIATION INC. POLITICAL)
ACTION COMMITTEE, and Jones, Scott)
as treasurer;)
GOVERNMENT IS NOT GOD, and) AF# 1622
NANCY M MURRAY as treasurer;)
HOOSIER POLITICAL ACTION) AF# 1623
COMMITTEE (HOOSIER PAC), and)
GILEAD KAPEN as treasurer;)
INTERNATIONAL COUNCIL OF) AF# 1624
CRUISE LINES POLITICAL ACTION)
COMM (ICCL-PAC), and J MICHAEL)
CRYE as treasurer;)
KIRKLAND, and Tomlinson, Stephen as) AF# 1625
treasurer;)

Federal Election Commission
Certification for Administrative Fines
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MARRIOTT INTERNATIONAL INC. AF# 1626
POLITICAL ACTION COMMITTEE, and
Froehlich, Melissa Ms. as treasurer;
MWW GROUP INC POLITICAL ACTION) AF# 1627
COMMITTEE, THE, and SETH)
ROSENSTEIN as treasurer;)
OHIO FINANCIAL SERVICES) AF# 1628
POLITICAL ACTION COMMITTEE, and)
Sander, Joseph R Mr. as treasurer;)
PUBLIC SERVICE ENTERPRISE GROUP) AF# 1629
INC. POLITICAL ACTION COMMITTEE)
(PEGPAC), and G, Mark Mr. Kahrer as)
treasurer;)
RECREATIONAL FISHING ALLIANCE) AF# 1630
PAC, and Stacey, Schneller A as treasurer;)
REHABCARE GROUP INC PAC, and) AF# 1631
MARK ANTHONY BOGOVICH as)
treasurer;)
REPUBLICAN JEWISH COALITION-) AF# 1632
POLITICAL ACTION COMMITTEE)
(RJC-PAC), and Brooks, Matthew as)
treasurer;)
RESPONSIBILITY AND FREEDOM) AF# 1633
WORK PAC (RFPAC), and JOHN P)
NAIL as treasurer;)
SI INTERNATIONAL INC POLITICAL) AF# 1635
ACTION COMMITTEE, and Thomas E.)
Dunn as treasurer;)
SNOW PAC, and Stanley R. de Waal as) AF# 1636
treasurer;)
SOCIETY FOR VASCULAR SURGERY) AF# 1637
POLITICAL ACTION COMMITTEE, and)
REBECCA MARON as treasurer;)
SOUTHEAST MILK INC POLITICAL) AF# 1638
ACTION COMMITTEE, and CHARLES)
GARRISON as treasurer;)
WELLCARE HEALTH PLANS INC. PAC) AF# 1641
(WELLCARE PAC), and Smith, David K.)
as treasurer;)

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CORRECTED CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on April 10, 2007 the Commission took the following actions on the Reason To Believe Recommendation - 12 Day Pre-General (Quarterly Filers) and 30 Day Post-General Report For The Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated April 04, 2007, on the following committees:

AF#1606 Decided by a vote of 4-0 to: (1) find reason to believe that ADVANCED MEDICAL TECHNOLOGY ASSOCIATION POLITICAL ACTION COMMITTEE, and Kenneth Mendez as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1611 Decided by a vote of 4-0 to: (1) find reason to believe that BI-COUNTY POLITICAL ACTION COMMITTEE (FKA SUFFOLK PAC), and IRA LAMEL as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1615 Decided by a vote of 4-0 to: (1) find reason to believe that DRUMMOND COMPANY INC. POLITICAL ACTION COMMITTEE (DPAC), and Stanfield, Scott O. Mr. as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1639 Decided by a vote of 4-0 to: (1) find reason to believe that TERRIPAC, and BRIAN SCHIAVO as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1640 Decided by a vote of 4-0 to: (1) find reason to believe that UNITED ASSN JOURNEYMEN & APPRENT OF PLUMB & PIPEFITTING IND LOCAL 322 COMM FOR POL ED, and JAMES REED as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount

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indicated on the report; (2) send the appropriate letter. Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1614 Decided by a vote of 4-0 to: (1) find reason to believe that COUNCIL FOR AFFORDABLE AND RURAL HOUSING PAC INC (CARH PAC), and TRAVIS A MILLER as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1618 Decided by a vote of 4-0 to: (1) find reason to believe that FLORIDA FOR AMERICAS FUTURE PAC, and HUGH WESTBROOK as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1634 Decided by a vote of 4-0 to: (1) find reason to believe that SECURE PAC, and LONDON THOMPSON as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1604 Decided by a vote of 4-0 to: (1) find reason to believe that AAI CORPORATION POLITICAL ACTION COMMITTEE, and RICHARD F CHRIST as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1605 Decided by a vote of 4-0 to: (1) find reason to believe that ADVANCED ACOUSTIC CONCEPTS INC POLITICAL ACTION COMMITTEE, and SCOTT WILLIAMS as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1607 Decided by a vote of 4-0 to: (1) find reason to believe that AGRI-MARK, INC LEGISLATIVE AND EDUCATIONAL COMMITTEE (ALEC), and HAROLD LARRABEE as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

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AF#1608 Decided by a vote of 4-0 to: (1) find reason to believe that AIRTRAN AIRWAYS INC POLITICAL ACTION COMMITTEE, and Gadek, Stanley as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1609 Decided by a vote of 4-0 to: (1) find reason to believe that ARMENIAN AMERICAN PAC (ARMENPAC), and Kechejian, Sarkis Dr. as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1610 Decided by a vote of 4-0 to: (1) find reason to believe that AVAYA INCORPORATED POLITICAL ACTION COMMITTEE, and Crowders, Charles E. as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1612 Decided by a vote of 4-0 to: (1) find reason to believe that CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT, and KAREN MELCHERT as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1613 Decided by a vote of 4-0 to: (1) find reason to believe that CONSTELLATION BRANDS INC POLITICAL ACTION COMMITTEE, and PERRY HUMPHREY as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1616 Decided by a vote of 4-0 to: (1) find reason to believe that ENERGEN CORPORATION POLITICAL ACTION COMMITTEE F/K/A ALAGASCO INC PAC, and DUDLEY C REYNOLDS as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

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AF#1619 Decided by a vote of 4-0 to: (1) find reason to believe that FLORIDA PBA INC FRIENDS OF LAW ENFORCEMENT, and DAVID BRUCE MURRELL as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1620 Decided by a vote of 4-0 to: (1) find reason to believe that FLORIDA SUGAR CANE LEAGUE PAC, and Ryan Weston as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1621 Decided by a vote of 4-0 to: (1) find reason to believe that FOREST LANDOWNERS ASSOCIATION INC. POLITICAL ACTION COMMITTEE, and Jones, Scott as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1622 Decided by a vote of 4-0 to: (1) find reason to believe that GOVERNMENT IS NOT GOD, and NANCY M MURRAY as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1623 Decided by a vote of 4-0 to: (1) find reason to believe that HOOSIER POLITICAL ACTION COMMITTEE (HOOSIER PAC), and GILEAD KAPEN as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1624 Decided by a vote of 4-0 to: (1) find reason to believe that INTERNATIONAL COUNCIL OF CRUISE LINES POLITICAL ACTION COMM (ICCL-PAC), and J MICHAEL CRYE as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1625 Decided by a vote of 4-0 to: (1) find reason to believe that KIRKLAND, and Tomlinson, Stephen as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1626 Decided by a vote of 4-0 to: (1) find reason to believe that MARRIOTT INTERNATIONAL INC. POLITICAL ACTION COMMITTEE, and Froehlich, Melissa Ms. as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1627 Decided by a vote of 4-0 to: (1) find reason to believe that MWW GROUP INC POLITICAL ACTION COMMITTEE, THE, and SETH ROSENSTEIN as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1628 Decided by a vote of 4-0 to: (1) find reason to believe that OHIO FINANCIAL SERVICES POLITICAL ACTION COMMITTEE, and Sander, Joseph R Mr. as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1629 Decided by a vote of 4-0 to: (1) find reason to believe that PUBLIC SERVICE ENTERPRISE GROUP INC. POLITICAL ACTION COMMITTEE (PEGPAC), and G, Mark Mr. Kahrer as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1630 Decided by a vote of 4-0 to: (1) find reason to believe that RECREATIONAL FISHING ALLIANCE PAC, and Stacey, Schneller A as treasurer violated 2 U.S.C. 434(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter.

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Commissioners Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1631 Decided by a vote of 4-0 to: (1) find reason to believe that REHABCARE GROUP INC PAC, and MARK ANTHONY BOGOVICH as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1632 Decided by a vote of 4-0 to: (1) find reason to believe that REPUBLICAN JEWISH COALITION-POLITICAL ACTION COMMITTEE (RJC-PAC), and Brooks, Matthew as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1633 Decided by a vote of 4-0 to: (1) find reason to believe that RESPONSIBILITY AND FREEDOM WORK PAC (RFPAC), and JOHN P NAIL as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1635 Decided by a vote of 4-0 to: (1) find reason to believe that SI INTERNATIONAL INC POLITICAL ACTION COMMITTEE, and Thomas E. Dunn as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1636 Decided by a vote of 4-0 to: (1) find reason to believe that SNOW PAC, and Stanley R. de Waal as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1637 Decided by a vote of 4-0 to: (1) find reason to believe that SOCIETY FOR VASCULAR SURGERY POLITICAL ACTION COMMITTEE, and REBECCA MARON as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

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AF#1638 Decided by a vote of 4-0 to: (1) find reason to believe that SOUTHEAST MILK INC POLITICAL ACTION COMMITTEE, and CHARLES GARRISON as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

AF#1641 Decided by a vote of 4-0 to: (1) find reason to believe that WELLCARE HEALTH PLANS INC. PAC (WELLCARE PAC), and Smith, David K. as treasurer violated 2 U.S.C. 434(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 Lenhard, Mason, von Spakovsky, and Walther voted affirmatively for the decision. Commissioner Weintraub did not vote.

Attest:

September 11, 2007
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 12, 2007

London Thompson
Secure PAC
P.O. Box 675
Bolton, MS 39041

C00411611
AF#: 1634

Dear London Thompson:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12 Day Pre-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report is required if your committee makes a contribution to or expenditure on behalf of a candidate in the general election. This report, covering the period through 10/18/2006, shall be filed no later than 10/26/2006, 2 U.S.C. 434(a). You were previously notified of the due date for this report. Records at the Federal Election Commission ("FEC") indicate that this report was not filed prior to four (4) days before the General Election held on 11/7/2006. You should file the report if you have not already done so.

The Act was further amended in 1999 to permit the FEC to impose civil money penalties for violations of the reporting requirements of 2 U.S.C. 434(a). 2 U.S.C. 437g(a)(4). On 4/10/2007, the FEC found that there is reason to believe ("RTB") that Secure PAC and you, as treasurer, violated 2 U.S.C. 434(a) by failing to file timely this report on or before 10/26/2006. 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 \$3,000. It is due by 5/20/2007 and is based on these factors:

Election Sensitivity of Report: Election Sensitive
Level of Activity: \$57,015
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

To Pay the Calculated Civil Money Penalty

To pay the calculated civil money penalty, send the enclosed remittance and your payment to the FEC at the address on page 3. Upon receipt of your payment, the FEC will send you a final determination letter.

To Challenge the RTB Finding and/or Calculated Civil Money Penalty

To challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found on page one, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received by 5/20/2007. Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty. The FEC will only consider challenges that are based on a factual error, miscalculation of the calculated civil money penalty by the FEC, or the existence of extraordinary

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circumstances that persisted for more than 48 hours that were beyond your control and prevented you from filing the report in a timely manner. Your response 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. Examples of circumstances that will not be considered extraordinary include, but are not limited to, negligence, problems with vendors or contractors, staff illness, computer failures and similar circumstances. 11 C.F.R. 111.35(b)(1)(iii) and (4).

Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of your right to present such argument in a petition to the district court under 2 U.S.C. 437g. 11 C.F.R. 111.38.

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.

If You Do Not Pay the Calculated Civil Money Penalty or Submit a Challenge

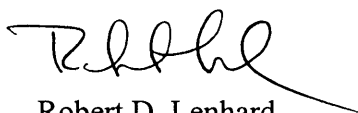
If you do not pay the calculated civil money penalty or submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Secure PAC and you, as treasurer, violated 2 U.S.C. 434(a) and assess a civil money penalty.

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 FEC 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. 111.45.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 2 U.S.C. 437g(a)(2). It will remain confidential in accordance with 2 U.S.C. 437g(a)(4)(B) and 437g(a)(12)(A) until it is placed on the public record in accordance with 11 C.F.R. 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

Additional information on the FEC's administrative fine program, including the final regulations, is located at the FEC's website at www.FEC.gov. If you have questions regarding the payment of the calculated civil money penalty, please contact Rhiannon Ryan 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. 1660) or (202) 694-1660.

Sincerely,



Robert D. Lenhard
Chairman

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ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. 111.43, the amount of your civil money penalty calculated at RTB is \$3,000 for the 2006 12 Day Pre-General Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by 5/20/2007. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Secure PAC

FEC ID#: C00411611

AF#: 1634

PAYMENT DUE DATE: 5/20/2007

PAYMENT AMOUNT DUE: \$3,000

SECURE PAC

Post Office Box 675
Bolton, MS 39041

London Thompson, Treasurer

May 8, 2007

VIA CERTIFIED MAIL – 7006 0100 0003 8666 8155

Robert Lenhard
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Lenhard:

This letter is in response to your April 12, 2007 letter concerning the electronic filing of the 12-Day Pre-General Report by Secure PAC (Committee ID: C00411611).

As a new committee, we were unaware of the of the Commission's requirement that all filings be made electronically once a certain financial threshold has been reached. In our case, the requirement was met shortly before the filing period in question began. As you know, the Report was filed in paper form. This paper filing contained all the information we would have conveyed in electronic form. To be clear, we will comply with this and all other FEC filing requirements in the future. However, we ask for leniency in this matter, as it was an oversight that did not involve any material misrepresentations to the Commission.

The Committee has complied with the spirit of our campaign finance and election laws. I trust that your further review of this matter will yield a similar, if not identical, conclusion. If additional information is needed, please contact me.

Sincerely,

London Thompson
London Thompson
Treasurer

Subscribed and sworn to before me on this 8th day of May, 2007

Robert P. [Signature]
Notary Public

MISSISSIPPI STATEWIDE NOTARY PUBLIC
MY COMMISSION EXPIRES MARCH 2, 2009
BONDED THRU STEG ALL NOTARY SERVICE

Paid for by SECURE PAC

2007 MAY 15 A 8:25

RECEIVED
ADMINISTRATIVE

27092613234



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 2007

London Thompson, as Treasurer
Secure PAC
P.O. Box 675
Bolton, MS 39041

C00411611
AF# 1634

Dear Ms. Thompson:

On May 14, 2007, the Commission received your written response ("challenge") which is being reviewed by the Office of Administrative Review. If you have any questions regarding your challenge, please contact this Office on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

Sincerely,

A handwritten signature in cursive script that reads "Jill I. Sugarman".

Jill I. Sugarman
Reviewing Analyst
Office of Administrative Review

27092613235

2007 MAY 17 P 12: 06

Date: May 17, 2007

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 1634

Committee Name: Secure PAC

Committee ID#: C00411611

Committee Address (if different than in RTB letter): N/A

Treasurer Name (if different than in RTB finding): N/A

Attachments:

**Copy of RTB Circulation Report, dated April 4, 2007 and RTB Certification,
dated April 10, 2007: Y**

Attachment #: 1

Certified Return Receipt (to be forwarded at later date if not yet received)(Y/N):Y

Attachment #: 2

Other Relevant Telecoms (Y/N): N

Attachment #: N/A

Original Correspondence Received by RAD in Response to RTB Letter (Y/N): N

Attachment #: N/A

RAD Staff Declaration (Y/N): Y

-Prior Notice, dated October 2, 2006

-MS-P, dated November 2, 2006.

-RTB Letter, dated April 12, 2007.

Attachment #: 4

Other RAD Information: (Y/N): N

Attachment#: N/A

27092613236

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to: LONDON THOMPSON SECURE PAC P.O. BOX 675 BOLTON, MS 39041</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery 4/16/07</p>	
		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number: (Transfer from service label)</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
		<p>7006 0810 0005 9266 7089</p>	

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

DECLARATION OF PATRICIA CARMONA

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Secure PAC:
 - A) Prior Notice, dated October 2, 2006 , referencing the 2006 Pre-General Report;
 - B) MS-P Letter, dated November 2, 2006, referencing the 2006 Pre-General Report;
 - C) Reason-to-Believe Letter, dated April 12, 2007, referencing the 2006 Pre-General Report.
3. I hereby certify that I have searched the Commission's public records and find that Secure PAC electronically filed the 2006 Pre-General Report with the Commission on December 7, 2006.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 17th day of May, 2007.



Patricia Carmona
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

● GENERAL ELECTION ● REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

October 2, 2006

I. QUARTERLY FILERS THAT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 18

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
Pre-General ³	10/01/06 - 10/18/06	10/23/06	10/26/06
Post-General	10/19/06 - 11/27/06	12/07/06	12/07/06

II. QUARTERLY FILERS THAT DO NOT MAKE GENERAL ELECTION CONTRIBUTIONS OR EXPENDITURES FROM OCTOBER 1 THROUGH OCTOBER 18²

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
Post-General	10/01/06 - 11/27/06	12/07/06	12/07/06

WHO MUST FILE

Party Committees and PACs (Nonconnected Committees and Separate Segregated Funds) must follow the above charts in order to determine whether they must file a report 12 days before the general election on November 7 (the Pre-General Election Report). All Party Committees and PACs, regardless of financial activity, must file a report 30 days after the general election (the Post-General Election Report). Committees must continue to file reports until the Commission notifies them in writing that their termination report has been accepted.

Certain party committees are required to file monthly reports (quarterly reporting is no longer an option for these committees). For more information, see the January 2006 Record, which can be found on the FEC web site at www.fec.gov/pages/record.shtml.

METHOD OF FILING

Quarterly Reports sent by registered or certified mail must be postmarked by the mailing date (please note that a certificate of mailing is not an acceptable method). Committees should keep the mailing receipt with its postmark as proof of filing.

If using overnight mail, the delivery service must receive the report by the mailing date. "Overnight mail" includes Priority or Express Mail having a delivery confirmation, or an overnight delivery service with an on-line tracking system and scheduled for next business day delivery. Quarterly Reports filed by any other means must be received by the Commission (or Secretary of the Senate for committees supporting only Senate candidates) by the filing date.

¹These dates indicate the beginning and the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered.

²Committees that made general election contributions or expenditures before October 1 and did not previously report them must also follow Chart I.

(over)

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48- AND 24-HOUR REPORTS OF INDEPENDENT EXPENDITURES

Any PAC or Party Committee that makes independent expenditures in connection with the general election may also have to file 48-hour or 24-hour reports. The 48-hour reporting requirement will be triggered each time the committee makes independent expenditures aggregating \$10,000 or more between January 1 and October 18, 2006. The 24-hour reporting requirement will be triggered each time the committee makes independent expenditures in connection with the general election aggregating \$1,000 between October 19 and November 5, 2006. See 11 CFR 104.4. These reports are *not* required when a Party Committee or PAC makes a contribution directly to a candidate.

QUARTERLY FILING SCHEDULE FOR REMAINDER OF 2006

REPORT	REPORTING PERIOD ¹	REG./CERT. & OVERNIGHT MAILING DATE	FILING DATE
Year-End	11/28/06 - 12/31/06	01/31/07	01/31/07

COMPLIANCE

- Treasurers of political committees are responsible for both the timeliness and the accuracy of all reports. They may be subject to monetary penalties if reports are inaccurate or are not filed on time.
- Under the Administrative Fine Program, political committees and their treasurers who fail to file their reports on time may be subject to civil money penalties up to \$16,000 (or more for repeat late- and non-filers). For additional information, see the enclosed handout entitled, "Administrative Fine Program" and visit the FEC web site at www.fec.gov/af.shtml.
- In addition, political committees that file illegible reports or use non-FEC forms (except for FEC-approved, computer-generated forms) will be required to refile their reports.
- Electronic filers who instead file on paper or submit an electronic report (either by direct transmission or on 3.5" diskette) that does not pass the validation test will be considered non-filers and may be subject to enforcement actions (including administrative fines).

ELECTRONIC FILING

Political committees that receive contributions or make expenditures in excess of \$50,000 in a calendar year, or that have reason to expect to do so, must submit their reports electronically. For additional information, review the enclosed handout entitled "Electronic Filing," call the FEC's Electronic Filing office at (800) 424-9530 or (202) 694-1642, and visit our web site at www.fec.gov/electfil/electron.shtml.

CHANGE IN FILING FREQUENCY

Committees able to change their reporting schedule (for example, from quarterly to monthly) who wish to do so must notify the Commission in writing when they file their next report due under their current reporting schedule. Electronic filers must file this request electronically. Committees may change their filing frequency no more than once per calendar year.

¹See footnote #1, on reverse side.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-P

November 2, 2006

London Thompson, Treasurer
Secure PAC
P.O. Box 675
Bolton, MS 39041

Identification Number: C00411611

Reference: 12 Day Pre-General Report (10/1/2006 – 10/18/2006)

Dear Treasurer:

Your Committee has failed to file the above-referenced report in an electronic format. In accordance with 11 C.F.R. 104.18, you are required to file this report electronically. 11 C.F.R. 104.18 further states that reports filed on paper do not satisfy a political committee's filing obligation. Your reporting obligation will not be satisfied until you file the above-referenced report in an electronic format. You should also review 11 C.F.R. 104.18 of the regulations regarding your future reporting obligations.

It is important that you file this report in an electronic format immediately with the Federal Election Commission. The failure to timely file this report may result in civil money penalties, an audit or legal enforcement action. The civil money calculation for late reports does not include a grace period and begins on the day following the due date for the report.

If you have further questions regarding this matter, please contact Kim Doughty in the Reports Analysis Division on our toll free number (800) 424-9530. Our local number is 202-694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

2603926345692613241



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2007 AUG 24 P 12:30

August 24, 2007

MEMORANDUM

To: The Commission

Through: Patrina M. Clark
Staff Director

From: John D. Gibson
Chief Compliance Officer

Shawn Woodhead Werth
Reviewing Officer
Office of Administrative Review

SENSITIVE

Subject: AF# 1634 – Secure PAC and London Thompson, as Treasurer
(C00411611)

The respondents' challenge for this case was due May 20, 2007, after the April 30, 2007 effective date of the revised administrative fine regulations. The Office of General Counsel informed this Office that if the respondents' challenge is due after the April 30 effective date, the new rules apply. The Reviewing Officer's recommendation, therefore, is based on the new rules.

The attached Reviewing Officer recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation.

After the 10 day period, the Reviewing Officer recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment

27092613242



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 24, 2007

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 1634 – Secure PAC and London Thompson, as Treasurer (C00411611)

On April 10, 2007, the Commission found reason to believe ("RTB") that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2006 12 Day Pre-General Report and made a preliminary determination that the civil money penalty was \$3,000 based on the schedule of penalties at 11 C.F.R. § 111.43. They were notified of the Commission's finding and RTB civil money penalty by the Reports Analysis Division ("RAD") on April 12, 2007.

Respondents' Response

On May 15, 2007, the Commission received the written response ("challenge") from the Treasurer who states that the Committee was new, and although unaware of the electronic filing threshold, met that threshold shortly before the end of the reporting period. Ms. Thompson states that the report was filed on paper containing all the information that would have been provided in electronic format and asks for "leniency" given that the Committee's oversight did not result in any "material misrepresentations."

Analysis of the Challenge

The 12 Day Pre-General Report was electronically filed on December 7, 2006, 42 days late. A paper copy was sent certified/registered mail on October 26, 2006.

The Federal Election Campaign Act ("Act") states that the treasurer of a political committee shall file a pre-election report which shall be filed no later than the 12th day (or posted by certified or registered mail no later than the 15th day) before any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election. 2 U.S.C. § 434(a)(4)(A)(ii) and 11 C.F.R. § 104.5(c)(1)(ii). Political committees required to file reports with the Commission must file in an electronic format if they have received contributions or made expenditures or expect to receive contributions or make expenditures in a calendar year aggregating in excess of \$50,000. 2 U.S.C. § 434(a)(11) and 11 C.F.R. § 104.18(a). Reports electronically filed must be received and validated at or before 11:59 p.m., Eastern Standard/Daylight Time on the prescribed filing date to be timely filed. 11 C.F.R. § 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

The Electronic Filing Office records show that the respondents downloaded the Commission's electronic filing software in January 2006, almost 10 months before the 12 Day Pre-General Report was due. The paper copy of the report that they submitted on

27092613243

October 26 shows that they made contributions on October 17 to two candidates participating in the 2006 General Election and that the Committee had received net contributions totaling \$67,000 in 2006 as of October 18. Because the Committee follows a quarterly filing schedule and they made these two contributions during the 12 Day Pre-General reporting period, they were required to file the 12 Day Pre-General Report. Because the Committee exceeded the \$50,000 threshold, they were also required to file it electronically.

They were notified by RAD on November 2, 2006 that the paper filing was unacceptable and that they needed to file it electronically. On November 30, the Treasurer requested and received an electronic filing password, and on December 7, electronically filed the report.

The other issues raised in the challenge (that it was an "oversight" and they complied with the "spirit of our campaign finance and election laws") do not fall within the list of defenses at 11 C.F.R. § 111.35(b). Their challenge fails to address any of the three valid excuses enumerated at 11 C.F.R. § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. The Reviewing Officer, therefore, recommends that the Commission make a final determination and assess a civil money penalty of \$3,000.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 1634 involving Secure PAC and London Thompson, as Treasurer, in making the final determination;
- (2) Make a final determination in AF# 1634 that Secure PAC and London Thompson, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$3,000; and
- (2) Send the appropriate letter.

Attachments

Attachment 1 - Challenge Received from Respondents
Attachment 2 -

Attachment 3 - Declaration from RAD

Attachment 4 - Declaration from OAR

27092613244

DECLARATION OF SHAWN WOODHEAD WERTH

1. I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I supervise research conducted with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 12 Day Pre-General Report, covering the period October 1 through October 18, 2006, is due October 26, 2006. If electronically filed, it must be received and validated at or before 11:59 p.m., Eastern Standard/Daylight Time on October 26 to be timely filed.
3. I hereby certify that I have searched the Commission's public records and that the documents identified herein are true and accurate copies of:
 - a) Pages 1 and 2 of the Summary Page, Page 3 of the Detailed Summary Page, Page 8 for Schedule B (Itemized Disbursements), and the Envelope Replacement Page for the paper copy of the report for Secure PAC and London Thompson, as Treasurer. According to Commission records, the paper copy was sent by registered/certified mail on October 26, 2006, received on October 31, 2006, and covers the period from October 1 through October 18, 2006. Line 11(d), Column B lists \$67,000.00 in total contributions received for the calendar year-to-date. Schedule B lists two \$1,000.00 contributions made on October 17, 2006 to the Donna Christensen Campaign and the Friends of Phil Hare. Donna Christensen and Phil Hare are 2006 General Election candidates; and
 - b) Page 1 of the Summary Page for the 2006 12 Day Pre-General Report filed electronically by Secure PAC and London Thompson, as Treasurer. According to Commission records, the report was received on December 7, 2006 and covers the period from October 1 through October 18, 2006.
4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 24th of August, 2007.



Shawn Woodhead Werth
Reviewing Officer
Office of Administrative Review
Federal Election Commission

27092613245

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**

For Other Than An Authorized Committee

RECEIVED
FEC MAIL
OPERATIONS CENTER

2006 OCT 31 A 8:02
Office Use Only

1. NAME OF COMMITTEE (in full) **USE FEC MAILING LABEL OR TYPE OR PRINT** Example: If typing, type over the lines

Secure PAC

ADDRESS (number and street)

P.O. Box 675

☐ Check if different than previously reported. (ACC)

Bolton

MS

39041

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

C00411611

3. IS THIS REPORT

☒

NEW (N)

OR

☐ AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- ☐ April 15 Quarterly Report (Q1)
☐ July 15 Quarterly Report (Q2)
☐ October 15 Quarterly Report (Q3)
☐ January 31 Quarterly Report (YE)
☐ July 31 Mid-Year Report (Non-election Year Only) (MY)
☐ Termination Report (TER)

(b) Monthly Report Due On:

- ☐ Feb 20 (M2) ☐ May 20 (M5) ☐ Aug 20 (M8) ☐ Nov 20 (M11) (Non-Election Year Only)
☐ Mar 20 (M3) ☐ Jun 20 (M6) ☐ Sep 20 (M9) ☐ Dec 20 (M12) (Non-Election Year Only)
☐ Apr 20 (M4) ☐ Jul 20 (M7) ☐ Oct 20 (M10) ☐ Jan 31 (YE)

(c) 12-Day PRE-Election Report for the:

- ☐ Primary (12P) ☒ General (12G) ☐ Runoff (12R)
☐ Convention (12C) ☐ Special (12G)

Election on

11

07

2006

in the State of

MS

(d) 30-Day Post-Election Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

In the State of

5. Covering Period

10

01

2006

through

10

18

2006

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

London J. Thompson

Signature of Treasurer

London J. Thompson

Electronically Filed by London J. Thompson

Date

10

26

2006

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C 437g.

Office
Use
Only

FEC FORM 3X
(Rev. 02/2003)

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name
Secure PAC

Report Covering the Period:

From:

MM
10

DD
01

YYYY
2006

To:

MM
10

DD
18

YYYY
2006

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1	2006	4155.21
(b) Cash on Hand at Beginning of Reporting Period	14136.76	
(c) Total Receipts (from Line 19)	30000.00	67039.60
(d) Subtotal (add lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	44136.76	71194.81
7. Total Disbursements (from Line 31)	27000.00	36027.85
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	17136.76	35166.96
9. Debts and Obligations owed TO the committee (itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations owed BY the committee (itemize all on Schedule C and/or Schedule D)	0.00	

☐ This Committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

27092613247

DETAILED SUMMARY PAGE OF RECEIPTS

FEC Form 3X (Rev. 02/2003)

Page 3

Write or Type Committee Name
Secure PAC

Report Covering the Period:

From:

MM
10

DD
01

YY YY YY
2006

To:

MM
10

DD
18

YY YY YY
2006

I. Receipts

COLUMN A Total This Period

COLUMN B Calendar Year-to-Date

11. Contributions (other than loans) From:

**(a) Individuals/Persons Other
Than Political Committees**

(i) Itemized (use Schedule A)

0.00

6000.00

(ii) Unitemized

0.00

0.00

(iii) TOTAL (add
Lines 11(a)(i) and (ii)

0.00

6000.00

(b) Political Party Committees

0.00

0.00

**(c) Other Political Committees
(such as PACs)**

30000.00

61000.00

(d) Total Contributions (add Lines

**11(a)(iii), (b) and (c)) (Carry
Totals to Line 33, page 5)**

30000.00

67000.00

**12. Transfers From Affiliated/Other
Party Committees**

0.00

0.00

13. All Loans Received

0.00

0.00

14. Loan Repayments Received

0.00

0.00

**15. Offsets To Operating Expenditures
(Refunds, Rebates, etc.)
(Carry Totals to Line 37, page 5)**

0.00

0.00

**16. Refunds of Contributions Made
to Federal candidates and Other
Political Committees**

0.00

0.00

**17. Other Federal Receipts
(Dividends, Interest, etc.)**

0.00

39.60

18. Transfers from Non-Federal and Levin Funds

**(a) Non-Federal Account
(from Schedule H3)**

0.00

0.00

(b) Levin Funds (from Schedule H5)

0.00

0.00

(c) Total Transfer (add 18(a) and 18(b))

0.00

0.00

**19. Total Receipts (add Lines 11(d),
12, 13, 14, 15, 16, 17, and 18(c))**

30000.00

67039.60

**20. Total Federal Receipts
(subtract Line 18(c) from Line 19)**

30000.00

67039.60

27092613248

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 8 / 8

☒ 21b ☐ 22 ☐ 23 ☐ 24 ☐ 25 ☐ 26
☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29 ☐ 30b

Any Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

Secure PAC

Full Name (Last, First, Middle Initial)

A. DCCC

Transaction ID: 61026.E23

Date of Disbursement

10 / 01 / 2006

Mailing Address 430 South Capitol Street

City Washington State DC Zip Code 20003-

Amount of Each Disbursement this Period

25000.00

Purpose of Disbursement
CAMPAIGN CONTRIBUTION

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☐ Other (specify) ▼

CAMPAIGN CONTRIBUTION

State: District:

Full Name (Last, First, Middle Initial)

B. Donna Christensen Campaign

Transaction ID: 61026.E24

Date of Disbursement

10 / 17 / 2006

Mailing Address P.O. Box 5197

City St. Croix State VI Zip Code 00823-

Amount of Each Disbursement this Period

1000.00

Purpose of Disbursement
CAMPAIGN CONTRIBUTION

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☐ Other (specify) ▼

CAMPAIGN CONTRIBUTION

State: District:

Full Name (Last, First, Middle Initial)

C. Friends of Phil Hare

Transaction ID: 61026.E25

Date of Disbursement

10 / 17 / 2006

Mailing Address 313 17th Street

City Rock Island State IL Zip Code 61201-

Amount of Each Disbursement this Period

1000.00

Purpose of Disbursement
CAMPAIGN CONTRIBUTION

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: ☐ Primary ☐ General ☐ Other (specify) ▼

CAMPAIGN CONTRIBUTION

State: District:

SUBTOTAL of Disbursements This Page (optional)

27000.00

TOTAL This Period (last page this line number only)

27000.00

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input checked="" type="checkbox"/> USPS Registered/Certified	Postmarked (R/C) <i>10-26-06</i>
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

J. H. [Signature]
PREPARER
(3/2005)

10-31-06
DATE PREPARED

27092613250

FEC
FORM 3XREPORT OF RECEIPTS
AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF
COMMITTEE (In full)USE FEC MAILING LABEL
OR TYPE OR PRINTExample: If typing, type
over the lines

Secure PAC

ADDRESS (number and street)

P.O. Box 675

Check if different
than previously
reported. (ACC)

Baton

MS

39041

2. FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

C00411611

3. IS THIS
REPORT

X

NEW
(N)

OR

AMENDED
(A)4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

April 15
Quarterly Report (Q1)

July 15
Quarterly Report (Q2)

October 15
Quarterly Report (Q3)

January 31
Quarterly Report (YE)

July 31 Mid-Year
Report (Non-election
Year Only) (MY)

Termination Report
(TER)

(b) Monthly
Report
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)
(Non-Election
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)
(Non-Election
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

Primary (12P)

X

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

11

07

2006

in the
State of

MS

(d) 30-Day
Post-Election
Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

in the
State of

5. Covering Period

10

01

2006

through

10

18

2006

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

London J. Thompson

Signature of Treasurer

Electronically Filed by London J. Thompson

Date

12

07

2006

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

Office
Use
OnlyFEC FORM 3X
(Rev. 02/2003)

27092613251



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA OVERNIGHT DELIVERY

August 27, 2007

London Thompson, as Treasurer
Secure PAC
PO Box 675
Bolton, Mississippi 39041

C00411611
AF# 1634

Dear Ms. Thompson:

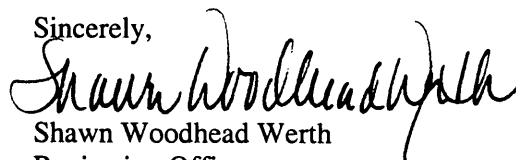
On April 10, 2007, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Secure PAC and you, as Treasurer ("respondents"), violated 2 U.S.C. § 434(a) for failing to file the 2006 12 Day Pre-General Report. The Commission also made a preliminary determination that the civil money penalty was \$3,000 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination in this matter. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463. As a result of the anthrax threat in the Washington, DC area, US Postal Service mail delivery to federal agencies, including the Commission, has been interrupted. Until regular mail delivery resumes, you may also file your written response with the Commission Secretary via facsimile (202-208-3333) or by courier at the same address (if you use an overnight delivery service, please use zip code 20004 instead of zip code 20463). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,


Shawn Woodhead Werth
Reviewing Officer
Office of Administrative Review

Attachment

27092613252



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2007 SEP 10 P 2:38

September 10, 2007

SENSITIVE

MEMORANDUM

To: The Commission

Through: Patrina M. Clark *mc*
Staff Director

From: John D. Gibson *JDG*
Chief Compliance Officer

Shawn Woodhead Werts *SWW*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 1634 – Secure PAC and
London Thompson, as Treasurer (C00411611)

On April 10, 2007, the Commission found reason to believe (“RTB”) that the respondents violated 2 U.S.C. § 434(a) for failing to file the 2006 12 Day Pre-General Report and also made a preliminary determination that the civil money penalty was \$3,000 based on the schedule of penalties at 11 C.F.R. § 111.43.

On May 15, 2007, the Commission received the respondents’ written response (“challenge”). After reviewing the challenge, the Reviewing Officer’s recommendation dated August 24, 2007 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that they violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$3,000 because they submitted no evidence that the RTB finding was based on factual errors, that the civil money penalty was improperly calculated at RTB, or that they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances.

Instead of filing a written response with the Commission Secretary within 10 days of transmittal of the recommendation in accordance with 11 C.F.R. § 111.36(f), the respondents paid the civil money penalty.

OAR Recommendations

- (1) Adopt the Reviewing Officer recommendation for AF# 1634 involving Secure PAC and London Thompson, as Treasurer, in making a final determination;
- (2) Make a final determination in AF# 1634 that Secure PAC and London Thompson, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$3,000; and
- (3) Send the appropriate letter.

27092613254



FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

DATE & TIME OF TRANSMITTAL: **Monday, September 10, 2007 4:00**

BALLOT DEADLINE: **Thursday, September 13, 2007 4:00**

COMMISSIONER: LENHARD, MASON, von SPAKOVSKY, WALTHER, WEINTRAUB

SUBJECT: **Final Determination Recommendation in AF 1634 –
Secure PAC and London Thompson, as Treasurer
(C00411611) Memorandum from the Chief
Compliance Officer and the Reviewing Officer
dated September 10, 2007**

- () I approve the recommendation(s)
- () I object to the recommendation(s)
- () I am recused from voting
- () No vote by ballot

COMMENTS: _____

DATE: _____

SIGNATURE: _____

A definite vote is required. All ballots must be signed and dated. Please return **ONLY THE BALLOT** to the Commission Secretary. Please return ballot no later than date and time shown above.

FROM THE OFFICE OF THE SECRETARY OF THE COMMISSION

27092613255

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation -) AF 1634
Secure PAC and London Thompson, as)
Treasurer (C00411611))

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby
certify that on September 13, 2007, the Commission decided by a vote of 5-0 to
take the following actions in AF 1634:

1. Adopt the Reviewing Officer recommendation for AF #1634 involving Secure PAC and London Thompson, as Treasurer, in making a final determination.
2. Make a final determination in AF #1634 that Secure PAC and London Thompson, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty of \$3,000.
3. Send the appropriate letter.

Commissioners Lenhard, Mason, von Spakovsky, Walther, and Weintraub
voted affirmatively for the decision.

Attest:

September 14, 2007
Date

Mary W. Dove
Mary W. Dove
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 19, 2007

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

London Thompson, as Treasurer
Secure PAC
PO Box 675
Bolton, Mississippi 39041

ID# C00411611
AF# 1634

Dear Ms. Thompson:

On April 10, 2007, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Secure PAC and you, as Treasurer, violated 2 U.S.C. § 434(a) for failing to file the 2006 12 Day Pre-General Report. By letter dated April 12, 2007, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at RTB of \$3,000 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On May 15, 2007, the Office of Administrative Review received the written response from you challenging the RTB civil money penalty.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that Secure PAC and you, as Treasurer, violated 2 U.S.C. § 434(a) and assess a civil money penalty in the amount of \$3,000 in accordance with 11 C.F.R. § 111.43. The basis for the Reviewing Officer's recommendation was included in the Final Determination Report, a copy of which was sent to you on August 27, 2007.

The \$3,000 payment for the civil money penalty was received at the Commission's lockbox on September 7, 2007.

On September 13, 2007, the Commission adopted the Reviewing Officer's recommendation, made a final determination that Secure PAC and you, as Treasurer, violated 2 U.S.C. § 434(a), and assessed a civil money penalty of \$3,000. It is based on the same factors used to calculate the civil money penalty at RTB. A copy of the final determination memorandum is attached.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this

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matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

If you have any questions regarding the payment of the civil money penalty, please contact Shawn Woodhead Werth on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

A handwritten signature in dark ink, appearing to read "David M. Mason", written over the printed name.

David M. Mason
Vice Chairman

Attachment

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QUALITY IS OUR PRIORITY FOR LOCKBOX 9058
SEQ# 001 \$ 0000300000 BA# 1 09-06-07 20 9



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usbancorp.
The New Service Connection

SECURE PAC
BENNIE G. THOMPSON
HONORARY CHAIR

15-21/653

1230

Date 09-04-07

Pay To The
Order Of

Federal Election Commission

\$ 3000.00

three thousand and 00/100

Dollars



Trustmark
National Bank
Jackson, MS

AF# 1684

Memo FEC IO# C00411611

Bennie Thompson



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1634

DATE SCANNED 10/26/07

SCANNER NO. 2

SCAN OPERATOR JED

27092613260