



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 1977

DATE SCANNED 7/16/09

SCANNER NO. 2

SCAN OPERATOR SES

29092631774



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 30, 2009

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: ROBERT A. HICKEY
STAFF DIRECTOR

FROM: JOHN D. GIBSON
CHIEF COMPLIANCE OFFICER

PATRICIA CARMONA *De for PC*
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

BY: NATALIYA IOFFE/RHIANNON MAGRUDER/SARI PICKERALL *RM*
COMPLIANCE BRANCH

SUBJECT: REASON TO BELIEVE RECOMMENDATION - 2008 12 DAY PRE-
GENERAL REPORT (UNAUTHORIZED QUARTERLY FILERS) AND
30 DAY POST-GENERAL REPORT (UNAUTHORIZED/AUTHORIZED
FILERS) FOR THE ADMINISTRATIVE FINE PROGRAM

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2009 MAR 30 3:30 PM

Attached are three lists of political committees and their treasurers who failed to file or timely file the 2008 12 Day Pre-General and/or the 2008 30 Day Post-General Report(s) in accordance with 2 U.S.C. 434(a). The first list is comprised of unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2008 through October 15, 2008, and failed to file or timely file the 2008 12 Day Pre-General Report. The second list is comprised of unauthorized committees that failed to file or timely file the 2008 30 Day Post-General Report. The third list is comprised of authorized committees of candidates who participated in the November 4, 2008 General Election that failed to file or timely file the 30 Day Post-General Report.

The committees appearing on the 2008 12 Day Pre-General Report list either filed the report more than five (5) days after the due date but prior to four (4) days before the 2008 General Election (considered a late filed report), 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 but within thirty (30) days of the due date (considered a late filed report),

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or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with 11 C.F.R. 111.43, these committees should be assessed the civil money penalties indicated in the attachments.

As noted above, the 2008 12 Day Pre-General Report circulation list includes unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2008 through October 15, 2008, but failed to file or timely file the 2008 12 Day Pre-General Election report. In order to accurately identify these committees for administrative fine purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12 Day Pre-General Report (12G) 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 (30G) submitted by an unauthorized quarterly filer that covered the period from October 1, 2008 through November 24, 2008 (55 days) was reviewed for activity which would have required the filing of a 12G. If our research indicated that a 12G was required, we utilized a three-step method to arrive at the activity on which to base the 12G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 27% (15 days (12G Filing Period)/55 days (30G Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 12G. If the same committee also failed to file the 30G in a timely manner, we based the 30G fine on the amount of the remaining level of activity. We arrived at this amount by subtracting the level of activity assigned to the 12G from the total amount of activity disclosed on the 30G. In this case, the committee will appear on both lists and will be assessed a fine for both the 12G and 30G 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.

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Federal Election Commission
Reason to Believe Circulation Report
2008 PRE-GENERAL Election Sensitive 10/23/2008 UNAUTH_Q

| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|---|----------------------|-----------|----|--------------|-----------|----------|-------------|
| 1956 | C00213231 | A DUDA & SONS, INC. POLITICAL ACTION COMMITTEE | TRACY DUDA CHAPMAN | \$116,833 | 0 | 12/3/2008 | Not Filed | \$8,250 | \$600 |
| 1957 | C00295097 | AMERICAN IRON AND STEEL INSTITUTE POLITICAL ACTION COMMITTEE (STFFI PAC) | THOMAS GIBSON | \$251,156 | 0 | 12/4/2008 | Not Filed | \$4,000 | \$500 |
| 1959 | C00211250 | AON CORPORATION POLITICAL ACTION COMMITTEE | PAUL HAGY | \$615,146 | 0 | 10/31/2008 | Not Filed | \$27,258 | \$1,400 |
| 1960 | C00249359 | BAKERY CONFECTIONERY TOBACCO WPKRS & GRAIN MILLERS INT'L UNION LOCAL 19 POL ORG 'BCTGM' | THOMAS EDWARD | \$129,499 | 0 | 12/18/2008 | Not Filed | \$2,893 | \$500 |
| 1962 | C00372862 | BIKES BELONG COALITION, LTD. POLITICAL ACTION COMMITTEE | GARY SJOQUIST | \$109,242 | 0 | 12/8/2008 | Not Filed | \$3,010 | \$500 |
| 1964 | C00386300 | CALUMET PAC | TERRENCE BRONOWSKI | \$496,285 | 0 | 12/1/2008 | Not Filed | \$14,000 | \$900 |
| 1965 | C00099937 | COOPER INDUSTRIES POLITICAL ACTION COMMITTEE | MR. TYLER W. JOHNSON | \$314,852 | 0 | 10/30/2008 | 7 | \$7,000 | \$170 |

| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|---|----------------------|-----------|----|--------------|-----------|---------|-------------|
| 1966 | C00130187 | DADE COUNTY FIRE FIGHTERS, LOCAL 1403 PAC | JOAQUIN DEL CUETO | \$290,798 | 0 | 12/17/2008 | Not Filed | \$8,829 | \$600 |
| 1967 | C00004952 | ELECTRIC POWER ASSOCIATIONS OF MISSISSIPPI ACTION COMMITTEE FOR RURAL ELECTRIFICATION | MR. MICHAEL CALLAHAN | \$468,071 | 0 | 12/8/2008 | Not Filed | \$3,000 | \$500 |

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|------|-----------|------------------------|------------------|-----------|---|------------|-----------|---------------|-------|
| 1969 | C00431981 | HEMOCARE & HOSPICE PAC | RUTH L. CONSTANT | \$252,603 | 0 | 11/26/2008 | Not Filed | \$6,063 (est) | \$600 |
|------|-----------|------------------------|------------------|-----------|---|------------|-----------|---------------|-------|

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|------|-----------|--|-------------------|-----------|---|-----------|-----------|---------------|---------|
| 1971 | C00388462 | ITC HOLDINGS CORP. PAC | ANNE JINKS | \$158,856 | 0 | 12/3/2008 | Not Filed | \$2,240 (est) | \$500 |
| 1972 | C00212522 | KELLY SERVICES INC POLITICAL ACTION COMMITTEE (KELLYPAC) | JAMES D. MCINTIRE | \$155,917 | 0 | 1/31/2009 | Not Filed | \$31,700 | \$1,400 |

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|------|-----------|---|---------------------|-----------|---|------------|-----------|---------------|---------|
| 1974 | C00409631 | LOUISIANA REFORM PAC | JOHN C. SCHMIDT | \$405,337 | 0 | 2/27/2009 | Not Filed | \$84,182 | \$4,000 |
| 1975 | C00272724 | MAYNARD COOPER AND GALE PC PAC | EDWARD A. HOSP | \$122,266 | 0 | 12/4/2008 | Not Filed | \$4,038 (est) | \$500 |
| 1976 | C00421008 | METAL LATHERS LOCAL 46 PAC | ROBERT LEDWITH | \$264,728 | 1 | 12/10/2008 | Not Filed | \$8,138 (est) | \$750 |
| 1977 | C00233304 | NATIONAL ASSOCIATION OF INDUSTRIAL AND OFFICE PROPERTIES, DEVELOPMENT PAC (NAIOP-PAC) | ELIZABETH R. GREENE | \$422,814 | 0 | 12/4/2008 | Not Filed | \$9,179 (est) | \$600 |

| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|-----|--------------|--|--------------------------|-----------|----|--------------|-----------|----------------|-------------|
| 179 | C00167627 | NORTEL POLITICAL ACTION COMMITTEE | MARY JO DORR | \$240,104 | 0 | 12/3/2008 | Not Filed | \$8,869 | \$600 |
| 180 | C00216754 | NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC | H. JULIAN PHILPOTT, JR. | \$187,936 | 0 | 12/4/2008 | Not Filed | \$3,058 (est) | \$500 |
| 181 | C00134742 | PLASTERERS' AND CEMENT MASONS' ACTION COMMITTEE | EARL F. HURD | \$102,460 | 0 | 1/7/2009 | Not Filed | \$3,589 (est) | \$500 |
| 182 | C00237065 | PORTLAND CEMENT ASSOCIATION INC. PCA PAC | MR. RICHARD C. CREIGHTON | \$245,129 | 0 | 1/6/2009 | Not Filed | \$2,240 | \$500 |
| 183 | C00025395 | PUBLIC SERVICE COMPANY OF NEW MEXICO RESPONSIBLE CITIZENS GROUP | MR. THOMAS SATEGNA | \$109,257 | 1 | 12/8/2008 | Not Filed | \$2,873 (est) | \$625 |
| 184 | C00432252 | REGIONS FINANCIAL CORPORATION POLITICAL ACTION COMMITTEE | VIRGINIA BEAR | \$887,679 | 0 | 12/1/2008 | Not Filed | \$13,251 (est) | \$900 |
| 185 | C00174011 | RETAIL, WHOLESALE & DEPARTMENT STORE UNION COMMITTEE ON POLITICAL EDUCATION (RWDSU COPE) | STUART H. APPELBAUM | \$181,673 | 0 | 11/5/2008 | Not Filed | \$20,776 | \$900 |
| 186 | C00220053 | RICELAND FOODS, INC. PAC | BILL J. REED | \$124,465 | 0 | 12/5/2008 | Not Filed | \$5,000 | \$600 |
| 187 | C00428268 | RIGHT TRACK PAC | HAL HYNEMAN | \$171,312 | 0 | 10/30/2008 | 7 | \$23,013 | \$220 |
| 188 | C00381459 | SOCIETY FOR VASCULAR SURGERY POLITICAL ACTION COMMITTEE | REBECCA MARON | \$182,712 | 1 | 12/4/2008 | Not Filed | \$3,102 (est) | \$625 |

| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--|-----------------|-----------|----|--------------|-----------|---------|-------------|
| 1989 | C00120030 | SOCIETY OF INDEPENDENT GASOLINE MARKETERS OF AMERICA PAC | ELAINE TALBOTT | \$495,580 | 0 | 12/1/2008 | Not Filed | \$6,250 | \$600 |
| 1990 | C00148155 | ST. LOUISANS FOR BETTER GOVERNMENT | SHELDON SANDMEL | \$115,326 | 1 | 11/6/2008 | Not Filed | \$3,049 | \$625 |

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|------|-----------|---|-------------------|-----------|---|------------|-----------|---------|-------|
| 1992 | C00228296 | THE ASCAP LEGISLATIVE FUND FOR THE ARTS | SUSAN BOLTERSDORF | \$294,359 | 0 | 11/4/2008 | Not Filed | \$7,189 | \$600 |
| 1993 | C00165878 | UNITED EMP PAC, CENTRAL LOUISIANA ELECTRIC CO. INC. | MELISSA LOHMAN | \$207,535 | 0 | 11/24/2008 | Not Filed | \$9,137 | \$600 |
| 1994 | C00235036 | ZURICH HOLDING COMPANY OF AMERICA COMMITTEE FOR GOOD GOVERNMENT (Z-PAC) | THOMAS A. BRADLEY | \$610,834 | 0 | 11/4/2008 | Not Filed | \$8,980 | \$600 |

Federal Election Commission
Reason to Believe Circulation Report
2008 POST-GENERAL Not Election Sensitive 12/04/2008 UNAUTH

| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|---|--------------------|-------------|----|--------------|-----------|-----------|-------------|
| 1995 | C00010322 | AMERICAN POSTAL WORKERS UNION COMMITTEE ON POLITICAL ACTION | TERRY R. STAPLETON | \$4,618,749 | 0 | 12/11/2008 | 7 | \$467,571 | \$3,900 |

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|------|-----------|---|--------------------|-----------|---|------------|-----------|-----------|---------|
| 1997 | C00406405 | BLOGPAC | CHRISTOPHER BOWERS | \$254,195 | 0 | 12/13/2008 | 9 | \$60,625 | \$975 |
| 1998 | C00415752 | BORDER HEALTH FEDERAL PAC | ERNIE PEREZ | \$802,565 | 0 | 1/29/2009 | Not Filed | \$100,107 | \$4,500 |
| 1999 | C00165803 | BUNCOMBE COUNTY REPUBLICAN PARTY | EDWARD S. OSADA | \$120,422 | 0 | 1/9/2009 | Not Filed | \$6,675 | \$300 |
| 2000 | C00410589 | CERNER CORPORATION | MARC NAUGHTON | \$263,666 | 0 | 12/26/2008 | 22 | \$10,288 | \$210 |
| 2001 | C00130187 | DADE COUNTY FIRE FIGHTERS, LOCAL 1403 PAC | JOAQUIN DEL CUETO | \$325,873 | 0 | 12/10/2008 | 6 | \$35,074 | \$320 |
| 2002 | C00214304 | DELHAIZE AMERICA POLITICAL ACTION COMMITTEE | TEROSS W. YOUNG | \$119,775 | 2 | 1/12/2009 | Not Filed | \$17,149 | \$750 |

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|------|-----------|--------------------|----------------|-----------|---|------------|----|---------|-------|
| 2004 | C00362178 | FAMILY-PAC FEDERAL | D. PAUL CAPRIO | \$119,333 | 1 | 12/29/2008 | 25 | \$5,249 | \$218 |
|------|-----------|--------------------|----------------|-----------|---|------------|----|---------|-------|

| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|---|--------------------|-------------|----|--------------|-----------|----------------|-------------|
| 2006 | C00276253 | INTERNATIONAL BROTHERHOOD OF PAINTERS AND ALLIED TRADES DISTRICT COUNCIL 21 PAC | JOSEPH ASHDALE | \$1,553,623 | 0 | 1/8/2009 | Not Filed | \$213,959 | \$6,500 |
| 2007 | C00212522 | KELLY SERVICES INC POLITICAL ACTION COMMITTEE (KELLYPAC) | JAMES D. MCINTIRE | \$165,194 | 0 | 1/31/2009 | Not Filed | \$9,277 | \$300 |
| 2009 | C00409631 | LOUISIANA REFORM PAC | JOHN C. SCHMIDT | \$437,034 | 0 | 2/27/2009 | Not Filed | \$31,696 | \$900 |
| 2010 | C00170696 | MARSHALL AND ILSLEY CORPORATION POLITICAL ACTION COMMITTEE | DYANA L. PAPPENFUS | \$132,557 | 0 | 1/6/2009 | Not Filed | \$44,233 | \$900 |
| 2011 | C00421008 | METAL LATHERS LOCAL 46 PAC | ROBERT LEDWITH | \$279,765 | 1 | 12/10/2008 | 6 | \$15,037 (est) | \$162 |
| 2012 | C00366922 | METROPOLITAN TRANSPORTATION AUTHORITY POLICE BENEVOLENT ASSOCIATION PAC | RAYMOND GIMMLER | \$144,220 | 0 | 1/9/2009 | Not Filed | \$11,485 | \$500 |
| 2013 | C00376384 | MONROE COUNTY DEMOCRATIC COMMITTEE | LEIGH KEGGERREIS | \$1,282,381 | 1 | 2/3/2009 | Not Filed | \$18,918 | \$625 |
| 2014 | C00092247 | NATIONAL ORGANIZATION FOR WOMEN PAC | LATIFA LYLES | \$489,092 | 0 | 12/23/2008 | 19 | \$17,000 | \$195 |
| 2015 | C00452854 | NEWAYGO COUNTY DEMOCRATIC EXECUTIVE COMMITTEE | CHARLES D. BENHAM | \$145,342 | 0 | 12/30/2009 | Not Filed | \$8,713 (est) | \$300 |

| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--|------------------------|-----------|----|--------------|-----------|----------------|-------------|
| 2016 | C00362210 | O'NEILL AND ASSOCIATES PAC | SUSAN WATSON | \$109,606 | 0 | 1/14/2009 | Not Filed | \$11,422 | \$500 |
| 2017 | C00165324 | PHILADELPHIA JOINT BOARD UNITE HERE TIPS | MS. MILDRED SALDANA | \$153,568 | 0 | 2/23/2009 | Not Filed | \$643 | \$250 |
| 2018 | C00134742 | PLASTERERS' AND CEMENT MASONS' ACTION COMMITTEE | EARL F. HURD | \$114,160 | 0 | 1/7/2009 | Not Filed | \$11,699 (est) | \$500 |
| 2019 | C00192849 | PLUMBERS AND PIPEFITTERS LOCAL UNION 74 | VICTOR SALVATORE | \$103,604 | 0 | 1/6/2009 | Not Filed | \$2,379 | \$250 |

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|------|-----------|---|-----------------------------|-----------|---|------------|-----------|----------|-------|
| 2021 | C00237065 | PORTLAND CEMENT ASSOCIATION INC. PCA PAC | MR. RICHARD C. CREIGHTON | \$247,169 | 0 | 1/6/2009 | Not Filed | \$2,040 | \$250 |
| 2022 | C00406553 | PROGRESSIVE VOTERS OF AMERICA | PHILIP FIERMONTÉ | \$194,586 | 0 | 12/11/2008 | 7 | \$50,021 | \$825 |

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|------|-----------|---|--------------------------------|-----------|---|------------|-----------|----------|-------|
| 2024 | C00153379 | SIERRA PACIFIC EMPLOYEES POLITICAL ACTION COMMITTEE | JOHN VINSKI | \$140,541 | 1 | 12/11/2008 | 7 | \$13,520 | \$168 |
| 2025 | C00278788 | SUFFOLK COUNTY DETECTIVES ASSN INC., POLITICAL ACTION COMMITTEE | WILLIAM RATHJEN | \$173,246 | 2 | 1/6/2009 | Not Filed | \$12,655 | \$750 |
| 2026 | C00363689 | TALLATCHEE CREEK INC. PAC | ELIZABETH EMBER CONATSER | \$493,267 | 0 | 1/2/2009 | 29 | \$40,900 | \$780 |

| AF# | Committee ID | Committee Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--|--------------------|-----------|----|--------------|-----------|----------|-------------|
| 2028 | C00400135 | UNITED HEALTH SERVICES PAC, INC. | CHRIS C. DOWNING | \$192,434 | 0 | 1/8/2009 | Not Filed | \$19,105 | \$500 |
| 2029 | C00377549 | USAFARMWORKERPAC | STUART J. MITCHELL | \$104,586 | 0 | 12/30/2008 | 26 | \$864 | \$155 |
| 2030 | C00417063 | WEST VIRGINIA REPUBLICAN PARTY, INC. | MARY V. RIGGALL | \$880,366 | 0 | 12/15/2008 | 11 | \$27,446 | \$420 |
| 2031 | C00048181 | WISCONSIN BANKERS ASSOCIATION (WISBANKPAC) | MRS. DEBORAH RUFER | \$241,494 | 0 | 12/10/2008 | 6 | \$27,016 | \$320 |

Federal Election Commission
Reason to Believe Circulation Report
2008 POST-GENERAL Not Election Sensitive 12/04/2008 AUTH

| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--|-------------------------|-----------------------|-------------|----|--------------|-----------|----------------|-------------|
| 2033 | C00449876 | COMMITTEE TO ELECT MARY WRIGHT | WRIGHT, MARY D. | MARY WRIGHT | \$343,017 | 1 | | Not Filed | \$57,169 (est) | \$3,375 |
| 2034 | C00418293 | COMMITTEE TO RE-ELECT HENRY HANK JOHNSON | JOHNSON, HENRY C. JR. | MALCOLM A. CUNNINGHAM | \$748,019 | 0 | 1/13/2009 | Not Filed | \$52,265 | \$2,700 |
| 2039 | C00446641 | JACK HOOGENDYK FOR US SENATE | HOOGENDYK JR, JACK | JACK HOOGENDYK | \$602,428 | 0 | 12/12/2008 | 8 | \$177,298 | \$2,000 |
| 2040 | C00317842 | KILPATRICK FOR UNITED STATES CONGRESS | KILPATRICK, CAROLYN MS. | MR. CARL STAFFORD | \$2,084,372 | 0 | 12/10/2008 | 6 | \$37,329 | \$320 |
| 2041 | C00449629 | REED FOR US SENATE 2008 INC | REED, CHRISTOPHER | KIMBERLY REED | \$117,880 | 0 | 1/14/2009 | Not Filed | \$26,742 | \$900 |
| 2042 | C00449231 | STRATEN FOR CONGRESS INC | STRATEN, ROLAND | RICHARD HOLLAND | \$139,752 | 0 | 12/10/2008 | 6 | \$19,399 | \$130 |

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Reason To Believe Recommendation –)
 2008 12 Day Pre-General)
 Report(Unauthorized Quarterly Filers) and)
 30 Day Post-General Report)
 (Unauthorized/Authorized Filers) for the)
 Administrative Fine Program (2008 Pre-)
 General) (UNAUTH):)
 COOPER INDUSTRIES POLITICAL) AF# 1965
 ACTION COMMITTEE, and JOHNSON,)
 TYLER W MR. as treasurer;)
 RIGHT TRACK PAC, and HAL) AF# 1987
 HYNEMAN as treasurer;)
 A DUDA & SONS, INC. POLITICAL) AF# 1956
 ACTION COMMITTEE, and TRACY)
 DUDA CHAPMAN as treasurer;)
 AMERICAN IRON AND STEEL) AF# 1957
 INSTITUTE POLITICAL ACTION)
 COMMITTEE (STEEL PAC), and)
 GIBSON, THOMAS as treasurer;)

AON CORPORATION POLITICAL) AF# 1959
 ACTION COMMITTEE, and HAGY,)
 PAUL as treasurer;)
 BAKERY CONFECTIONERY TOBACCO) AF# 1960
 WKRS & GRAIN MILLERS INT'L)
 UNION LOCAL 19 POL ORG 'BCTGM',)
 and EDWARD, THOMAS as treasurer;)

BIKES BELONG COALITION, LTD.) AF# 1962
 POLITICAL ACTION COMMITTEE, and)
 GARY SJOQUIST as treasurer;)

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CALUMET PAC, and TERRENCE) AF# 1964
BRONOWSKI as treasurer;)
DADE COUNTY FIRE FIGHTERS,) AF# 1966
LOCAL 1403 PAC, and DEL CUETO,)
JOAQUIN as treasurer;)
ELECTRIC POWER ASSOCIATIONS OF) AF# 1967
MISSISSIPPI ACTION COMMITTEE)
FOR RURAL ELECTRIFICATION, and)
CALLAHAN, MICHAEL - MR. as)
treasurer;)

HOMECARE & HOSPICE PAC, and) AF# 1969
CONSTANT, RUTH L as treasurer;)

ITC HOLDINGS CORP. PAC, and JINKS,) AF# 1971
ANNE as treasurer;)
KELLY SERVICES INC POLITICAL) AF# 1972
ACTION COMMITTEE (KELLYPAC),)
and JAMES D MCINTIRE as treasurer;)

LOUISIANA REFORM PAC, and) AF# 1974
SCHMIDT, JOHN C as treasurer;)
MAYNARD COOPER AND GALE PC) AF# 1975
PAC, and EDWARD A HOSP as treasurer;)
METAL LATHERS LOCAL 46 PAC, and) AF# 1976
ROBERT LEDWITH as treasurer;)
NATIONAL ASSOCIATION OF) AF# 1977
INDUSTRIAL AND OFFICE)
PROPERTIES, DEVELOPMENT PAC)
(NAIOP-PAC), and ELIZABETH R)
GREENE as treasurer;)

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Federal Election Commission
Certification for Administrative Fines
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| | | |
|---------------------------------------|---|----------|
| NORTEL POLITICAL ACTION |) | AF# 1979 |
| COMMITTEE, and MARY JO DORR as |) | |
| treasurer; |) | |
| NORTH CAROLINA FARM BUREAU |) | AF# 1980 |
| FEDERATION INC POL ACT CMTE INC |) | |
| (AKA) NC FARM BUREAU FARMPAC, |) | |
| and PHILPOTT, H. JULIAN JR. as |) | |
| treasurer; |) | |
| PLASTERERS' AND CEMENT MASONS' |) | AF# 1981 |
| ACTION COMMITTEE, and HURD, |) | |
| EARL F as treasurer; |) | |
| PORTLAND CEMENT ASSOCIATION |) | AF# 1982 |
| INC. PCA PAC, and RICHARD C. |) | |
| CREIGHTON MR. as treasurer; |) | |
| PUBLIC SERVICE COMPANY OF NEW |) | AF# 1983 |
| MEXICO RESPONSIBLE CITIZENS |) | |
| GROUP, and SATEGNA, THOMAS MR. |) | |
| as treasurer; |) | |
| REGIONS FINANCIAL CORPORATION |) | AF# 1984 |
| POLITICAL ACTION COMMITTEE, and |) | |
| BEAR, VIRGINIA as treasurer; |) | |
| RETAIL, WHOLESALE & |) | AF# 1985 |
| DEPARTMENT STORE UNION |) | |
| COMMITTEE ON POLITICAL |) | |
| EDUCATION (RWDSU COPE), and |) | |
| STUART H APPELBAUM as treasurer; |) | |
| RICELAND FOODS, INC. PAC, and |) | AF# 1986 |
| REED, BILL J. as treasurer; |) | |
| SOCIETY FOR VASCULAR SURGERY |) | AF# 1988 |
| POLITICAL ACTION COMMITTEE, and |) | |
| ROBERT ZWOLAK DR. as treasurer; |) | |
| SOCIETY OF INDEPENDENT |) | AF# 1989 |
| GASOLINE MARKETERS OF AMERICA |) | |
| PAC, and ELAINE TALBOTT as treasurer; |) | |
| ST. LOUISANS FOR BETTER |) | AF# 1990 |
| GOVERNMENT, and SANDMEL, |) | |
| SHELDON as treasurer; |) | |

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THE ASCAP LEGISLATIVE FUND FOR) AF# 1992
THE ARTS, and BOLTERSDORF, SUSAN)
as treasurer;)
UNITED EMP PAC, CENTRAL) AF# 1993
LOUISIANA ELECTRIC CO. INC., and)
MELISSA LOHMAN as treasurer;)
ZURICH HOLDING COMPANY OF) AF# 1994
AMERICA COMMITTEE FOR GOOD)
GOVERNMENT (Z-PAC), and)
BRADLEY, THOMAS A as treasurer;)

CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby
certify that on March 31, 2009 the Commission took the following actions on the Reason
To Believe Recommendation – 2008 12 Day Pre-General Report (Unauthorized Quarterly
Filers) and 30 Day Post-General Report (Unauthorized/Authorized Filers) for the
Administrative Fine Program (2008 Pre-General) (UNAUTH) as recommended in the
Reports Analysis Division's Memorandum dated March 30, 2009, on the following
committees:

AF#1965 Decided by a vote of 6-0 to: (1) find reason to believe that COOPER
INDUSTRIES POLITICAL ACTION COMMITTEE, and JOHNSON, TYLER W 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 Baucly, Hunter, McGahn II, Petersen, Walther, and Weintraub
voted affirmatively for the decision.

AF#1987 Decided by a vote of 6-0 to: (1) find reason to believe that RIGHT
TRACK PAC, and HAL HYNEMAN 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 Bauerly, Hunter, McGahn II,
Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#1956 Decided by a vote of 6-0 to: (1) find reason to believe that A DUDA & SONS, INC. POLITICAL ACTION COMMITTEE, and TRACY DUDA CHAPMAN 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 Baucry, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1957 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICAN IRON AND STEEL INSTITUTE POLITICAL ACTION COMMITTEE (STEEL PAC), and GIBSON, THOMAS 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 Baucry, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1959 Decided by a vote of 6-0 to: (1) find reason to believe that AON CORPORATION POLITICAL ACTION COMMITTEE, and HAGY, PAUL 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 Baucry, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1960 Decided by a vote of 6-0 to: (1) find reason to believe that BAKERY CONFECTIONERY TOBACCO WORKS & GRAIN MILLERS INT'L UNION LOCAL 19 POL ORG 'BCTGM', and EDWARD, THOMAS 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 Baucry, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1962 Decided by a vote of 6-0 to: (1) find reason to believe that BIKES BELONG COALITION, LTD. POLITICAL ACTION COMMITTEE, and GARY SJOQUIST 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1964 Decided by a vote of 6-0 to: (1) find reason to believe that CALUMET PAC, and TERRENCE BRONOWSKI 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1966 Decided by a vote of 6-0 to: (1) find reason to believe that DADE COUNTY FIRE FIGHTERS, LOCAL 1403 PAC, and DEL CUETO, JOAQUIN 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1967 Decided by a vote of 6-0 to: (1) find reason to believe that ELECTRIC POWER ASSOCIATIONS OF MISSISSIPPI ACTION COMMITTEE FOR RURAL ELECTRIFICATION, and CALLAHAN, MICHAEL - 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1969 Decided by a vote of 6-0 to: (1) find reason to believe that HOMECARE & HOSPICE PAC, and CONSTANT, RUTH L 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#1971 Decided by a vote of 6-0 to: (1) find reason to believe that ITC HOLDINGS CORP. PAC, and JINKS, ANNE 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1972 Decided by a vote of 6-0 to: (1) find reason to believe that KELLY SERVICES INC POLITICAL ACTION COMMITTEE (KELLYPAC), and JAMES D MCINTIRE 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1974 Decided by a vote of 6-0 to: (1) find reason to believe that LOUISIANA REFORM PAC, and SCHMIDT, JOHN C 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1975 Decided by a vote of 6-0 to: (1) find reason to believe that MAYNARD COOPER AND GALE PC PAC, and EDWARD A HOSP 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1976 Decided by a vote of 6-0 to: (1) find reason to believe that METAL LATHERS LOCAL 46 PAC, and ROBERT LEDWITH 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 Bauerly,

Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1977 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL ASSOCIATION OF INDUSTRIAL AND OFFICE PROPERTIES, DEVELOPMENT PAC (NAIOP-PAC), and ELIZABETH R GREENE 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1979 Decided by a vote of 6-0 to: (1) find reason to believe that NORTEL POLITICAL ACTION COMMITTEE, and MARY JO DORR 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1980 Decided by a vote of 6-0 to: (1) find reason to believe that NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC, and PHILPOTT, H. JULIAN JR. 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1981 Decided by a vote of 6-0 to: (1) find reason to believe that PLASTERERS' AND CEMENT MASONS' ACTION COMMITTEE, and HURD, EARL F 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1982 Decided by a vote of 6-0 to: (1) find reason to believe that PORTLAND CEMENT ASSOCIATION INC. PCA PAC, and RICHARD C. CREIGHTON 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#1983 Decided by a vote of 6-0 to: (1) find reason to believe that PUBLIC SERVICE COMPANY OF NEW MEXICO RESPONSIBLE CITIZENS GROUP, and SATEGNA, THOMAS 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1984 Decided by a vote of 6-0 to: (1) find reason to believe that REGIONS FINANCIAL CORPORATION POLITICAL ACTION COMMITTEE, and BEAR, VIRGINIA 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1985 Decided by a vote of 6-0 to: (1) find reason to believe that RETAIL, WHOLESALE & DEPARTMENT STORE UNION COMMITTEE ON POLITICAL EDUCATION (RWDSU COPE), and STUART H APPELBAUM 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1986 Decided by a vote of 6-0 to: (1) find reason to believe that RICELAND FOODS, INC. PAC, and REED, BILL J. 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1988 Decided by a vote of 6-0 to: (1) find reason to believe that SOCIETY FOR VASCULAR SURGERY POLITICAL ACTION COMMITTEE, and ROBERT ZWOLAK 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1989 Decided by a vote of 6-0 to: (1) find reason to believe that SOCIETY OF INDEPENDENT GASOLINE MARKETERS OF AMERICA PAC, and ELAINE TALBOTT 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1990 Decided by a vote of 6-0 to: (1) find reason to believe that ST. LOUISANS FOR BETTER GOVERNMENT, and SANDMEL, SHELDON as treasurer

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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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1992 Decided by a vote of 6-0 to: (1) find reason to believe that THE ASCAP LEGISLATIVE FUND FOR THE ARTS, and BOLTERSDORF, SUSAN 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1993 Decided by a vote of 6-0 to: (1) find reason to believe that UNITED EMP PAC, CENTRAL LOUISIANA ELECTRIC CO. INC., and MELISSA LOHMAN 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 Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1994 Decided by a vote of 6-0 to: (1) find reason to believe that ZURICH HOLDING COMPANY OF AMERICA COMMITTEE FOR GOOD GOVERNMENT (Z-PAC), and BRADLEY, THOMAS 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. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 31, 2009
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 6, 2009

Elizabeth R. Greene as Treasurer
National Association of Industrial and Office Properties,
Development PAC (NAIOP-PAC)
2201 Cooperative Way, 3rd Floor
Herndon, VA 20171

C00233304
AF#: 1977

Dear Ms. Greene:

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 if your committee makes a contribution to or expenditure on behalf of a candidate in the general election. This report, covering the period through October 15, 2008, shall be filed no later than October 23, 2008. 2 U.S.C. § 434(a). Because records at the Federal Election Commission ("FEC") indicate that this activity was not disclosed prior to four (4) days before the General Election held on November 4, 2008, the report is considered not filed for the purpose of calculating the civil money penalty.

The Act was 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 March 31, 2009, the FEC found that there is reason to believe ("RTB") that National Association of Industrial and Office Properties, Development PAC (NAIOP-PAC) and you as treasurer violated 2 U.S.C. § 434(a) by failing to file timely this report on or before October 23, 2008. 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 \$600. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-11.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. Your payment is due within forty (40) days of the finding, or by May 10, 2009, and is based on these factors:

Election Sensitivity of Report: Election Sensitive
Level of Activity: \$9,179
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

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To Pay the Calculated Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. 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

If you should decide 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 within forty (40) days of the Commission's RTB finding, or May 10, 2009. 11 C.F.R. § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty. The FEC will only consider challenges that are based on a factual error in the RTB finding; miscalculation of the calculated civil money penalty by the FEC; or your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 C.F.R. § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to, a failure of Commission computers or Commission-provided software despite you seeking technical assistance from Commission personnel and resources; a widespread disruption of information transmissions over the Internet that is not caused by the Commission's or your computer systems or Internet service provider; and severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to, negligence; delays caused by vendors or contractors; treasurer and staff illness, inexperience or unavailability; committee computer, software, or internet service provider failures; failure to know filing dates; and failure to use filing software properly. 11 C.F.R. § 111.35(d). 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. 11 C.F.R. § 111.36(c).

Pursuant to the Commission's regulations, the "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 National Association of Industrial and Office Properties, Development PAC (NAIOP-PAC) and you as treasurer violated 2 U.S.C. § 434(a) and assess a civil money penalty.

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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.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Rhiannon Magruder 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.

On behalf of the Commission,



Steven T. Walther
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 \$600 for the 2008 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 May 10, 2009. 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: National Association of Industrial and Office Properties, Development PAC
(NAIOP-PAC)

FEC ID#: C00233304

AF#: 1977

PAYMENT DUE DATE: May 10, 2009

PAYMENT AMOUNT DUE: \$600

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2009 MAY 29 P 1:20

May 29, 2009

MEMORANDUM

SENSITIVE

TO: THE COMMISSION

THROUGH: ROBERT A. HICKEY
STAFF DIRECTOR

FROM: JOHN D. GIBSON
CHIEF COMPLIANCE OFFICER

PATRICIA CARMONA
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

BY: NATALIYA IOFFE/RHIANNON MAGRUDER
COMPLIANCE BRANCH

SUBJECT: ADMINISTRATIVE FINE PROGRAM – FINAL DETERMINATION
RECOMMENDATION FOR THE 2008 12 DAY PRE-GENERAL REPORT
(UNAUTHORIZED QUARTERLY FILERS) AND 30 DAY POST-
GENERAL REPORT (UNAUTHORIZED/AUTHORIZED FILERS)

Attached are six (6) lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at the RTB stage for failure to file or failure to timely file the 2008 12 Day Pre-General and/or the 2008 30 Day Post-General Report(s). The attached lists contain the following:

1. 2008 12 Day Pre-General Report (Unauthorized Quarterly Filers) – Paid
2. 2008 12 Day Pre-General Report (Unauthorized Quarterly Filers) – Not Paid
3. 2008 30 Day Post-General Report (Unauthorized) – Paid
4. 2008 30 Day Post-General Report (Unauthorized) – Not Paid
5. 2008 30 Day Post-General Report (Authorized) – Paid
6. 2008 30 Day Post-General Report (Authorized) – Not Paid

The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR 111.34 and 11 CFR 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

Reports Analysis Division (RAD) recommends that the Commission take no further action against ITC Holdings Corp. PAC (AF 1971) and Nortel Political Action Committee (AF 1979). At the RTB stage, RAD's research showed that these committees had activity which would require them to file a 12 Day Pre-General Report, yet they had failed to do so. After the RTB finding, the committees informed RAD of data entry errors and filed amendments to correct the discrepancies. The amendments showed that the committees were not required to file a 12 Day Pre-General Report, and therefore did not violate 2 U.S.C. 434(a). As such, RAD recommends no further action against ITC Holdings Corp. PAC and Nortel Political Action Committee.

For your information, two (2) committees detailed below disclosed a level of activity after the RTB finding which would result in a lowered civil money penalty at Final Determination (FD).

- Committee to Elect Mary Wright (AF 2033) disclosed no activity after the RTB finding, which would result in no civil money penalty (previously estimated to be \$3,375).

RAD Recommendation

- (1) Take no further action against ITC Holdings Corp. PAC (AF 1971) and Anne Jinks, Treasurer, in regards to AF 1971.
- (2) Take no further action against Nortel Political Action Committee and Mary Jo Dorr, Treasurer, in regards to AF 1979.
- (3) Make final determination that all other political committees and their treasurers listed on the attached reports violated 2 U.S.C. 434(a) and assess the final civil money penalties so indicated.
- (4) Send the appropriate letters.

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Federal Election Commission
FD Circulation Report Fine Paid
2008 PRE-GENERAL Election Sensitive 10/23/2008 UNAUTH_Q

| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|--|--------------|--------------------|--------------|-----------|----------|----|------------|-------------|---------------------|------------|-------------|
| 1956 | A DUDA & SONS, INC. POLITICAL ACTION COMMITTEE | C00213231 | TRACY DUDA CHAPMAN | 12/03/2008 | Not Filed | \$8,250 | 0 | 03/31/2009 | \$600 | \$600 | 04/28/2009 | \$600 |
| 1957 | AMERICAN IRON AND STEEL INSTITUTE POLITICAL ACTION COMMITTEE (STEEL PAC) | C00295097 | THOMAS GIBSON | 12/04/2008 | Not Filed | \$4,000 | 0 | 03/31/2009 | \$500 | \$500 | 05/12/2009 | \$500 |
| 1959 | AON CORPORATION POLITICAL ACTION COMMITTEE | C00211250 | PAUL HAGY | 10/31/2008 | Not Filed | \$27,258 | 0 | 03/31/2009 | \$1,400 | \$1,400 | 05/12/2009 | \$1,400 |
| 1960 | BAKERY CONFECTIONERY TOBACCO WKRS & GRAIN MILLERS INT'L UNION LOCAL 19 POL ORG 'BCTGM' | C00249359 | THOMAS EDWARD | 12/18/2008 | Not Filed | \$2,893 | 0 | 03/31/2009 | \$500 | \$500 | 05/12/2009 | \$500 |
| 1962 | BIKES BELONG COALITION, LTD. POLITICAL ACTION COMMITTEE | C00372862 | GARY SJOQUIST | 12/08/2008 | Not Filed | \$3,010 | 0 | 03/31/2009 | \$500 | \$500 | 05/13/2009 | \$500 |
| 1964 | CALUMET PAC | C00386300 | TERRENCE BRONOWSKI | 12/01/2008 | Not Filed | \$14,000 | 0 | 03/31/2009 | \$900 | \$900 | 05/06/2009 | \$900 |
| 1965 | COOPER INDUSTRIES POLITICAL ACTION COMMITTEE | C00099937 | TYLER W. JOHNSON | 10/30/2008 | 7 | \$7,000 | 0 | 03/31/2009 | \$170 | \$170 | 04/27/2009 | \$170 |
| 1966 | DADE COUNTY FIRE FIGHTERS, LOCAL 1403 PAC | C00130187 | STEVEN JESSUP | 12/17/2008 | Not Filed | \$8,829 | 0 | 03/31/2009 | \$600 | \$600 | 04/21/2009 | \$600 |
| 1967 | ELECTRIC POWER ASSOCIATIONS OF MISSISSIPPI ACTION COMMITTEE FOR RURAL ELECTRIFICATION | C00004952 | MICHAEL CALLAHAN | 12/08/2008 | Not Filed | \$3,000 | 0 | 03/31/2009 | \$500 | \$500 | 04/17/2009 | \$500 |
| 1969 | HOMECARE & HOSPICE PAC | C00431981 | RUTH L. CONSTANT | 11/26/2008 | Not Filed | \$6,063 | 0 | 03/31/2009 | \$600 | \$600 | 05/05/2009 | \$600 |
| 1974 | LOUISIANA REFORM PAC | C00409631 | JOHN C. SCHMIDT | 02/27/2009 | Not Filed | \$84,182 | 0 | 03/31/2009 | \$4,000 | \$4,000 | 05/12/2009 | \$4,000 |

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| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|--|--------------|-------------------------|--------------|-----------|----------|----|------------|-------------|---------------------|------------|-------------|
| 1975 | MAYNARD COOPER & GALE PC PAC | C00272724 | EDWARD A. HOSP | 12/04/2008 | Not Filed | \$4,038 | 0 | 03/31/2009 | \$500 | \$500 | 04/17/2009 | \$500 |
| 1976 | METAL LATHERS LOCAL 46 PAC | C00421008 | ROBERT LEDWITH | 12/10/2008 | Not Filed | \$8,138 | 1 | 03/31/2009 | \$750 | \$750 | 05/06/2009 | \$750 |
| 1977 | NAIOP-PAC | C00233304 | ELIZABETH R. GREENE | 12/04/2008 | Not Filed | \$9,179 | 0 | 03/31/2009 | \$600 | \$600 | 05/06/2009 | \$600 |
| 1980 | NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC | C00216754 | H. JULIAN PHILPOTT, JR. | 12/04/2008 | Not Filed | \$3,058 | 0 | 03/31/2009 | \$500 | \$500 | 04/20/2009 | \$500 |
| 1981 | PLASTERERS' AND CEMENT MASONS' ACTION COMMITTEE | C00134742 | EARL F. HURD | 01/07/2009 | Not Filed | \$3,589 | 0 | 03/31/2009 | \$500 | \$500 | 05/08/2009 | \$500 |
| 1982 | PORTLAND CEMENT ASSOCIATION INC. PCA PAC | C00237065 | RICHARD C. CREIGHTON | 01/06/2009 | Not Filed | \$2,240 | 0 | 03/31/2009 | \$500 | \$500 | 04/23/2009 | \$500 |
| 1983 | PUBLIC SERVICE COMPANY OF NEW MEXICO RESPONSIBLE CITIZENS GROUP | C00025395 | THOMAS SATEGNA | 12/08/2008 | Not Filed | \$2,873 | 1 | 03/31/2009 | \$625 | \$625 | 04/29/2009 | \$625 |
| 1984 | REGIONS FINANCIAL CORPORATION POLITICAL ACTION COMMITTEE | C00432252 | VIRGINIA BEAR | 12/01/2008 | Not Filed | \$13,251 | 0 | 03/31/2009 | \$900 | \$900 | 05/04/2009 | \$900 |
| 1985 | RETAIL, WHOLESALE & DEPARTMENT STORE UNION COMMITTEE ON POLITICAL EDUCATION (RWDSU COPE) | C00174011 | STUART H. APPELBAUM | 11/05/2008 | Not Filed | \$20,776 | 0 | 03/31/2009 | \$900 | \$900 | 05/08/2009 | \$900 |
| 1986 | RICELAND FOODS, INC. PAC | C00220053 | BILL J. REED | 12/05/2008 | Not Filed | \$5,000 | 0 | 03/31/2009 | \$600 | \$600 | 04/29/2009 | \$600 |
| 1987 | RIGHT TRACK PAC | C00428268 | HAL HYNEMAN | 10/30/2008 | 7 | \$23,013 | 0 | 03/31/2009 | \$220 | \$220 | 05/11/2009 | \$220 |
| 1988 | SOCIETY FOR VASCULAR SURGERY POLITICAL ACTION COMMITTEE | C00381459 | REBECCA MARON | 12/04/2008 | Not Filed | \$3,102 | 1 | 03/31/2009 | \$625 | \$625 | 05/11/2009 | \$625 |
| 1989 | SOCIETY OF INDEPENDENT GASOLINE MARKETERS OF AMERICA PAC | C00120030 | ELAINE TALBOTT | 12/01/2008 | Not Filed | \$6,250 | 0 | 03/31/2009 | \$600 | \$600 | 05/11/2009 | \$600 |

| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|---|--------------|-------------------|--------------|-----------|---------|----|------------|-------------|---------------------|------------|-------------|
| 1990 | ST. LOUISANS FOR BETTER GOVERNMENT | C00148155 | SHELDON SANDMEL | 11/06/2008 | Not Filed | \$3,049 | 1 | 03/31/2009 | \$625 | \$625 | 05/08/2009 | \$625 |
| 1992 | THE ASCAP LEGISLATIVE FUND FOR THE ARTS | C00228296 | SUSAN BOLTERSDORF | 11/04/2008 | Not Filed | \$7,189 | 0 | 03/31/2009 | \$600 | \$600 | 04/21/2009 | \$600 |
| 1993 | UNITED EMP PAC, CENTRAL LOUISIANA ELECTRIC CO. INC. | C00165878 | MELISSA LOHMAN | 11/24/2008 | Not Filed | \$9,137 | 0 | 03/31/2009 | \$600 | \$600 | 04/23/2009 | \$600 |
| 1994 | ZURICH HOLDING COMPANY OF AMERICA COMMITTEE FOR GOOD GOVERNMENT (Z-PAC) | C00235036 | THOMAS A. BRADLEY | 11/04/2008 | Not Filed | \$8,980 | 0 | 03/31/2009 | \$600 | \$600 | 05/11/2009 | \$600 |

Federal Election Commission
FD Circulation Report Fine Not Paid
2008 PRE-GENERAL Election Sensitive 10/23/2008 UNAUTH_Q

| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Days Since RTB | FD Penalty |
|------|--|--------------|-------------------|--------------|-----------|----------|----|------------|-------------|----------------|------------|
| 1971 | ITC HOLDINGS CORP. PAC | C00388462 | ANNE JINKS | 12/03/2008 | Not Filed | \$0 | 0 | 03/31/2009 | \$500 | 59 | NFA |
| 1972 | KELLY SERVICES INC POLITICAL ACTION COMMITTEE (KELLYPAC) | C00212522 | JAMES D. MCINTIRE | 01/31/2009 | Not Filed | \$31,700 | 0 | 03/31/2009 | \$1,400 | 59 | \$1,400 |
| 1979 | NORTEL POLITICAL ACTION COMMITTEE | C00167627 | MARY JO DORR | 12/03/2008 | Not Filed | \$0 | 0 | 03/31/2009 | \$600 | 59 | NFA |

Federal Election Commission
FD Circulation Report Fine Paid
2008 POST-GENERAL Not Election Sensitive 12/04/2008 UNAUTH

| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|---|--------------|--------------------|--------------|-----------|-----------|----|------------|-------------|---------------------|------------|-------------|
| 1995 | AMERICAN POSTAL WORKERS UNION COMMITTEE ON POLITICAL ACTION | C00010322 | TERRY R. STAPLETON | 12/11/2008 | 7 | \$467,571 | 0 | 03/31/2009 | \$3,900 | \$3,900 | 04/23/2009 | \$3,900 |
| 1997 | BLOGPAC | C00406405 | CHRISTOPHER BOWERS | 12/13/2008 | 9 | \$60,625 | 0 | 03/31/2009 | \$975 | \$975 | | \$975 |
| 1998 | BORDER HEALTH FEDERAL PAC | C00415752 | ERNIE PEREZ | 01/29/2009 | Not Filed | \$100,107 | 0 | 03/31/2009 | \$4,500 | \$4,500 | 05/11/2009 | \$4,500 |
| 1999 | BUNCOMBE COUNTY REPUBLICAN PARTY | C00165803 | DOROTHEA ALDERFER | 01/09/2009 | Not Filed | \$6,675 | 0 | 03/31/2009 | \$300 | \$300 | 05/06/2009 | \$300 |
| 2000 | CERNER CORPORATION | C00410589 | MARC NAUGHTON | 12/26/2008 | 22 | \$10,288 | 0 | 03/31/2009 | \$210 | \$210 | 05/11/2009 | \$210 |
| 2001 | DADE COUNTY FIRE FIGHTERS, LOCAL 1403 PAC | C00130187 | STEVEN JESSUP | 12/10/2008 | 6 | \$35,074 | 0 | 03/31/2009 | \$320 | \$320 | 04/21/2009 | \$320 |
| 2002 | DELHAIZE AMERICA POLITICAL ACTION COMMITTEE | C00214304 | TEROSS W. YOUNG | 01/12/2009 | Not Filed | \$17,149 | 2 | 03/31/2009 | \$750 | \$750 | 05/04/2009 | \$750 |
| 2004 | FAMILY-PAC FEDERAL | C00362178 | D. PAUL CAPRIO | 12/29/2008 | 25 | \$5,249 | 1 | 03/31/2009 | \$218 | \$218 | 04/17/2009 | \$218 |
| 2006 | INTERNATIONAL BROTHERHOOD OF PAINTERS AND ALLIED TRADES DISTRICT COUNCIL 21 PAC | C00276253 | JOSEPH ASHDALE | 01/08/2009 | Not Filed | \$213,959 | 0 | 03/31/2009 | \$6,500 | \$6,500 | 05/11/2009 | \$6,500 |
| 2009 | LOUISIANA REFORM PAC | C00409631 | JOHN C. SCHMIDT | 02/27/2009 | Not Filed | \$31,696 | 0 | 03/31/2009 | \$900 | \$900 | 05/12/2009 | \$900 |
| 2010 | MARSHALL AND ILSLEY CORPORATION POLITICAL ACTION COMMITTEE | C00170696 | DYANA L. PAPERFUS | 01/06/2009 | Not Filed | \$44,233 | 0 | 03/31/2009 | \$900 | \$900 | 04/17/2009 | \$900 |
| 2011 | METAL LATHERS LOCAL 46 PAC | C00421008 | ROBERT LEDWITH | 12/10/2008 | 6 | \$15,037 | 1 | 03/31/2009 | \$162 | \$162 | 05/06/2009 | \$162 |
| 2012 | METROPOLITAN TRANSPORTATION AUTHORITY POLICE BENEVOLENT ASSOCIATION PAC | C00366922 | RAYMOND GIMMLER | 01/09/2009 | Not Filed | \$11,485 | 0 | 03/31/2009 | \$500 | \$500 | 05/12/2009 | \$500 |
| 2013 | MONROE COUNTY DEMOCRATIC COMMITTEE | C00376384 | LEIGH KEGGEREIS | 02/03/2009 | Not Filed | \$18,918 | 1 | 03/31/2009 | \$625 | \$625 | 05/15/2009 | \$625 |

| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|---|--------------|--------------------------|--------------|-----------|----------|----|------------|-------------|---------------------|------------|-------------|
| 2014 | NATIONAL ORGANIZATION FOR WOMEN PAC | C00092247 | LATIFA LYLES | 12/23/2008 | 19 | \$17,000 | 0 | 03/31/2009 | \$195 | \$195 | 04/28/2009 | \$195 |
| 2015 | NEWAYGO COUNTY DEMOCRATIC EXECUTIVE COMMITTEE | C00452854 | CHARLES D. BENHAM | 12/30/2009 | Not Filed | \$10,447 | 0 | 03/31/2009 | \$300 | \$300 | 05/12/2009 | \$300 |
| 2016 | O'NEILL AND ASSOCIATES PAC | C00362210 | BENJAMIN JOSEPHSON | 01/14/2009 | Not Filed | \$11,422 | 0 | 03/31/2009 | \$500 | \$500 | 05/11/2009 | \$500 |
| 2017 | PHILADELPHIA JOINT BOARD UNITE HERE TIPS | C00165324 | MILDRED SALDANA | 02/23/2009 | Not Filed | \$643 | 0 | 03/31/2009 | \$250 | \$250 | 05/06/2009 | \$250 |
| 2018 | PLASTERERS' AND CEMENT MASONS' ACTION COMMITTEE | C00134742 | EARL F. HURD | 01/07/2009 | Not Filed | \$11,699 | 0 | 03/31/2009 | \$500 | \$500 | 05/08/2009 | \$500 |
| 2019 | PLUMBERS AND PIPEFITTERS LOCAL UNION 74 | C00192849 | VICTOR SALVATORE | 01/06/2009 | Not Filed | \$2,379 | 0 | 03/31/2009 | \$250 | \$250 | 04/17/2009 | \$250 |
| 2021 | PORTLAND CEMENT ASSOCIATION INC. PCA PAC | C00237065 | RICHARD C. CREIGHTON | 01/06/2009 | Not Filed | \$2,040 | 0 | 03/31/2009 | \$250 | \$250 | 04/23/2009 | \$250 |
| 2022 | PROGRESSIVE VOTERS OF AMERICA | C00406553 | F. PHILIP FIERMONTE | 12/11/2008 | 7 | \$50,021 | 0 | 03/31/2009 | \$825 | \$825 | 04/29/2009 | \$825 |
| 2024 | SIERRA PACIFIC EMPLOYEES POLITICAL ACTION COMMITTEE | C00153379 | JOHN VINSKI | 12/11/2008 | 7 | \$13,520 | 1 | 03/31/2009 | \$168 | \$168 | 05/05/2009 | \$168 |
| 2025 | SUFFOLK COUNTY DETECTIVES ASSN INC., POLITICAL ACTION COMMITTEE | C00278788 | WILLIAM RATHJEN | 01/06/2009 | Not Filed | \$12,655 | 2 | 03/31/2009 | \$750 | \$750 | 05/07/2009 | \$750 |
| 2026 | TALLATCHEE CREEK INC. PAC | C00363689 | ELIZABETH EMBER CONATSER | 01/02/2009 | 29 | \$40,900 | 0 | 03/31/2009 | \$780 | \$780 | 05/14/2009 | \$780 |
| 2028 | UNITED HEALTH SERVICES PAC, INC. | C00400135 | CHRIS C. DOWNING | 01/08/2009 | Not Filed | \$19,105 | 0 | 03/31/2009 | \$500 | \$500 | 05/13/2009 | \$500 |
| 2029 | USAFARMWORKERPAC | C00377549 | STUART J. MITCHELL | 12/30/2008 | 26 | \$864 | 0 | 03/31/2009 | \$155 | \$155 | 04/23/2009 | \$155 |
| 2030 | WEST VIRGINIA REPUBLICAN PARTY, INC. | C00417063 | MARY V. RIGGALL | 12/15/2008 | 11 | \$27,446 | 0 | 03/31/2009 | \$420 | \$420 | 05/11/2009 | \$420 |
| 2031 | WISCONSIN BANKERS ASSOCIATION (WISBANKPAC) | C00048181 | DEBORAH RUFER | 12/10/2008 | 6 | \$27,016 | 0 | 03/31/2009 | \$320 | \$320 | 05/08/2009 | \$320 |

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Federal Election Commission
FD Circulation Report Fine Not Paid
2008 POST-GENERAL Not Election Sensitive 12/04/2008 UNAUTH

| AF# | Committee Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Days Since RTB | FD Penalty |
|-----|----------------|--------------|-----------|--------------|-----------|-----|----|----------|-------------|----------------|------------|
|-----|----------------|--------------|-----------|--------------|-----------|-----|----|----------|-------------|----------------|------------|

| | | | | | | | | | | | |
|------|--|-----------|-------------------|------------|-----------|---------|---|------------|-------|----|-------|
| 2007 | KELLY SERVICES INC POLITICAL ACTION COMMITTEE (KELLYPAC) | C00212522 | JAMES D. MCINTIRE | 01/31/2009 | Not Filed | \$9,277 | 0 | 03/31/2009 | \$300 | 59 | \$300 |
|------|--|-----------|-------------------|------------|-----------|---------|---|------------|-------|----|-------|

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FD Circulation Report Fine Paid
2008 POST-GENERAL Not Election Sensitive 12/04/2008 AUTH

| AF# | Committee Name | Candidate Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Final Money Penalty | Date Paid | Amount Paid |
|------|--|-----------------------|--------------|-----------------------|--------------|-----------|-----------|----|------------|-------------|---------------------|------------|-------------|
| 2034 | COMMITTEE TO RE-ELECT HENRY HANK JOHNSON | JOHNSON JR., HENRY C. | C00418293 | MALCOLM A. CUNNINGHAM | 01/13/2009 | Not Filed | \$52,265 | 0 | 03/31/2009 | \$2,700 | \$2,700 | 05/12/2009 | \$2,700 |
| 2039 | JACK HOOGENDYK FOR US SENATE | HOOGENDYK JR., JACK | C00446641 | JACK HOOGENDYK | 12/12/2008 | 8 | \$177,298 | 0 | 03/31/2009 | \$2,000 | \$2,000 | 05/05/2009 | \$2,000 |
| 2040 | KILPATRICK FOR UNITED STATES CONGRESS | KILPATRICK, CAROLYN | C00317842 | CARL STAFFORD | 12/10/2008 | 6 | \$37,329 | 0 | 03/31/2009 | \$320 | \$320 | 05/11/2009 | \$320 |
| 2041 | REED FOR US SENATE 2008 INC | REED, CHRISTOPHER | C00449629 | KIMBERLY REED | 01/14/2009 | Not Filed | \$26,742 | 0 | 03/31/2009 | \$900 | \$900 | 05/13/2009 | \$900 |
| 2042 | STRATEN FOR CONGRESS INC | STRATEN, ROLAND | C00449231 | RICHARD HOLLAND | 12/10/2008 | 6 | \$19,399 | 0 | 03/31/2009 | \$130 | \$130 | 04/21/2009 | \$130 |

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Federal Election Commission
 FD Circulation Report Fine Not Paid
 2008 POST-GENERAL Not Election Sensitive 12/04/2008 AUTH

| AF# | Committee Name | Candidate Name | Committee ID | Treasurer | Receipt Date | Days Late | LOA | PV | RTB Date | RTB Penalty | Days Since RTB | FD Penalty |
|------|--------------------------------|-----------------|--------------|--------------------|--------------|-----------|-----------|----|------------|-------------|----------------|------------|
| 2033 | COMMITTEE TO ELECT MARY WRIGHT | WRIGHT, MARY D. | C00449876 | MARY DELOIS WRIGHT | | Not Filed | \$0 (est) | 1 | 03/31/2009 | \$3,375 | 59 | \$0 |

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Administrative Fines Final Determination)
 Recommendation for the 12 Day Pre-)
 General (Unauthorized Quarterly Filers) and)
 30 Day Post-General Report)
 (Unauthorized/Authorized Filers):)
 COOPER INDUSTRIES POLITICAL) AF# 1965
 ACTION COMMITTEE, and JOHNSON,)
 TYLER W MR. as treasurer;)
 RIGHT TRACK PAC, and HAL) AF# 1987
 HYNEMAN as treasurer;)
 A DUDA & SONS, INC. POLITICAL) AF# 1956
 ACTION COMMITTEE, and TRACY)
 DUDA CHAPMAN as treasurer;)
 AMERICAN IRON AND STEEL) AF# 1957
 INSTITUTE POLITICAL ACTION)
 COMMITTEE (STEEL PAC), and)
 GIBSON, THOMAS as treasurer;)
 AON CORPORATION POLITICAL) AF# 1959
 ACTION COMMITTEE, and HAGY,)
 PAUL as treasurer;)
 BAKERY CONFECTIONERY TOBACCO) AF# 1960
 WKRS & GRAIN MILLERS INT'L)
 UNION LOCAL 19 POL ORG 'BCTGM',)
 and EDWARD, THOMAS as treasurer;)

BIKES BELONG COALITION, LTD.) AF# 1962
 POLITICAL ACTION COMMITTEE, and)
 GARY SJOQUIST as treasurer;)
 CALUMET PAC, and TERRENCE) AF# 1964
 BRONOWSKI as treasurer;)
 DADE COUNTY FIRE FIGHTERS,) AF# 1966
 LOCAL 1403 PAC, and JESSUP, STEVEN)
 as treasurer;)

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ELECTRIC POWER ASSOCIATIONS OF MISSISSIPPI ACTION COMMITTEE FOR RURAL ELECTRIFICATION, and CALLAHAN, MICHAEL - MR. as treasurer; AF# 1967

HEMOCARE & HOSPICE PAC, and CONSTANT, RUTH L. as treasurer;) AF# 1969

ITC HOLDINGS CORP. PAC, and JINKS, ANNE as treasurer;) AF# 1971

KELLY SERVICES INC POLITICAL ACTION COMMITTEE (KELLYPAC), and JAMES D MCINTIRE as treasurer;) AF# 1972

LOUISIANA REFORM PAC, and SCHMIDT, JOHN C as treasurer;) AF# 1974

MAYNARD COOPER & GALE PC PAC, and HOSP, EDWARD A as treasurer;) AF# 1975

METAL LATHERS LOCAL 46 PAC, and ROBERT LEDWITH as treasurer;) AF# 1976

NAIOP-PAC, and GREENE, ELIZABETH R. as treasurer;) AF# 1977

NORTEL POLITICAL ACTION COMMITTEE, and MARY JO DORR as treasurer;) AF# 1979

NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC, and PHILPOTT, H. JULIAN JR. as treasurer;) AF# 1980

PLASTERERS' AND CEMENT MASONS' ACTION COMMITTEE, and HURD, EARL F as treasurer;) AF# 1981

PORTLAND CEMENT ASSOCIATION INC. PCA PAC, and RICHARD C. CREIGHTON MR. as treasurer;) AF# 1982

PUBLIC SERVICE COMPANY OF NEW MEXICO RESPONSIBLE CITIZENS GROUP, and SATEGNA, THOMAS MR. as treasurer;) AF# 1983

REGIONS FINANCIAL CORPORATION POLITICAL ACTION COMMITTEE, and BEAR, VIRGINIA as treasurer;) AF# 1984

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RETAIL, WHOLESALE & AF# 1985
DEPARTMENT STORE UNION
COMMITTEE ON POLITICAL
EDUCATION (RWDSU COPE), and
STUART H APPELBAUM as treasurer;
RICELAND FOODS, INC. PAC, and) AF# 1986
REED, BILL J. as treasurer;)
SOCIETY FOR VASCULAR SURGERY) AF# 1988
POLITICAL ACTION COMMITTEE, and)
ROBERT ZWOLAK DR. as treasurer;)
SOCIETY OF INDEPENDENT) AF# 1989
GASOLINE MARKETERS OF AMERICA)
PAC, and ELAINE TALBOTT as treasurer;)
ST. LOUISANS FOR BETTER) AF# 1990
GOVERNMENT, and SANDMEL,)
SHELDON as treasurer;)

THE ASCAP LEGISLATIVE FUND FOR) AF# 1992
THE ARTS, and BOLTERSDORF, SUSAN)
as treasurer;)
UNITED EMP PAC, CENTRAL) AF# 1993
LOUISIANA ELECTRIC CO. INC., and)
MELISSA LOHMAN as treasurer;)
ZURICH HOLDING COMPANY OF) AF# 1994
AMERICA COMMITTEE FOR GOOD)
GOVERNMENT (Z-PAC), and)
BRADLEY, THOMAS A as treasurer;)
COOPER INDUSTRIES POLITICAL) AF# 1965
ACTION COMMITTEE, and JOHNSON,)
TYLER W MR. as treasurer;)
RIGHT TRACK PAC, and HAL) AF# 1987
HYNEMAN as treasurer;)
A DUDA & SONS, INC. POLITICAL) AF# 1956
ACTION COMMITTEE, and TRACY)
DUDA CHAPMAN as treasurer;)
AMERICAN IRON AND STEEL) AF# 1957
INSTITUTE POLITICAL ACTION)
COMMITTEE (STEEL PAC), and)
GIBSON, THOMAS as treasurer;)
AON CORPORATION POLITICAL) AF# 1959
ACTION COMMITTEE, and HAGY,)
PAUL as treasurer;)

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Federal Election Commission
Certification for Administrative Fines
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BAKERY CONFECTIONERY TOBACCO) AF# 1960
WKRS & GRAIN MILLERS INT'L)
UNION LOCAL 19 POL ORG 'BCTGM',)
and EDWARD, THOMAS as treasurer;)

BIKES BELONG COALITION, LTD.) AF# 1962
POLITICAL ACTION COMMITTEE, and)
GARY SJOQUIST as treasurer;)
CALUMET PAC, and TERRENCE) AF# 1964
BRONOWSKI as treasurer;)
DADE COUNTY FIRE FIGHTERS,) AF# 1966
LOCAL 1403 PAC, and JESSUP, STEVEN)
as treasurer;)
ELECTRIC POWER ASSOCIATIONS OF) AF# 1967
MISSISSIPPI ACTION COMMITTEE)
FOR RURAL ELECTRIFICATION, and)
CALLAHAN, MICHAEL - MR. as)
treasurer;)
HOMECARE & HOSPICE PAC, and) AF# 1969
CONSTANT, RUTH L. as treasurer;)
ITC HOLDINGS CORP. PAC, and JINKS,) AF# 1971
ANNE as treasurer;)
KELLY SERVICES INC POLITICAL) AF# 1972
ACTION COMMITTEE (KELLYPAC),)
and JAMES D MCINTIRE as treasurer;)
LOUISIANA REFORM PAC, and) AF# 1974
SCHMIDT, JOHN C as treasurer;)
MAYNARD COOPER & GALE PC PAC,) AF# 1975
and HOSP, EDWARD A as treasurer;)
METAL LATHERS LOCAL 46 PAC, and) AF# 1976
ROBERT LEDWITH as treasurer;)
NAIOP-PAC, and GREENE, ELIZABETH) AF# 1977
R. as treasurer;)
NORTEL POLITICAL ACTION) AF# 1979
COMMITTEE, and MARY JO DORR as)
treasurer;)
NORTH CAROLINA FARM BUREAU) AF# 1980
FEDERATION INC POL ACT CMTE INC)
(AKA) NC FARM BUREAU FARM PAC,)
and PHILPOTT, H. JULIAN JR. as)
treasurer;)
PLASTERERS' AND CEMENT MASONS') AF# 1981
ACTION COMMITTEE, and HURD,)
EARL F as treasurer;)

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Federal Election Commission
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PORTLAND CEMENT ASSOCIATION) AF# 1982
INC. PCA PAC, and RICHARD C.)
CREIGHTON MR. as treasurer;)
PUBLIC SERVICE COMPANY OF NEW) AF# 1983
MEXICO RESPONSIBLE CITIZENS)
GROUP, and SATEGNA, THOMAS MR.)
as treasurer;)
REGIONS FINANCIAL CORPORATION) AF# 1984
POLITICAL ACTION COMMITTEE, and)
BEAR, VIRGINIA as treasurer;)
RETAIL, WHOLESALE &) AF# 1985
DEPARTMENT STORE UNION)
COMMITTEE ON POLITICAL)
EDUCATION (RWDSU COPE), and)
STUART H APPELBAUM as treasurer;)
RICELAND FOODS, INC. PAC, and) AF# 1986
REED, BILL J. as treasurer;)
SOCIETY FOR VASCULAR SURGERY) AF# 1988
POLITICAL ACTION COMMITTEE, and)
ROBERT ZWOLAK DR. as treasurer;)
SOCIETY OF INDEPENDENT) AF# 1989
GASOLINE MARKETERS OF AMERICA)
PAC, and ELAINE TALBOTT as treasurer;)
ST. LOUISANS FOR BETTER) AF# 1990
GOVERNMENT, and SANDMEL,)
SHELDON as treasurer;)

THE ASCAP LEGISLATIVE FUND FOR) AF# 1992
THE ARTS, and BOLTERSDORF, SUSAN)
as treasurer;)
UNITED EMP PAC, CENTRAL) AF# 1993
LOUISIANA ELECTRIC CO. INC., and)
MELISSA LOHMAN as treasurer;)
ZURICH HOLDING COMPANY OF) AF# 1994
AMERICA COMMITTEE FOR GOOD)
GOVERNMENT (Z-PAC), and)
BRADLEY, THOMAS A as treasurer;)

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CERTIFICATION

I, Mary W. Dove, Secretary of the Federal Election Commission, do hereby certify that on June 01, 2009 the Commission took the following actions on the Administrative Fines Final Determination Recommendation for the 12 Day Pre-General (Unauthorized Quarterly Filers) and 30 Day Post-General Report (Unauthorized/Authorized Filers) as recommended in the Reports Analysis Division's Memorandum dated May 29, 2009, on the following committees:

AF#1965 Decided by a vote of 6-0 to: (1) make a final determination that COOPER INDUSTRIES POLITICAL ACTION COMMITTEE, and JOHNSON, TYLER W MR. as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1987 Decided by a vote of 6-0 to: (1) make a final determination that RIGHT TRACK PAC, and HAL HYNEMAN as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1956 Decided by a vote of 6-0 to: (1) make a final determination that A DUDA & SONS, INC. POLITICAL ACTION COMMITTEE, and TRACY DUDA CHAPMAN as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1957 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN IRON AND STEEL INSTITUTE POLITICAL ACTION COMMITTEE (STEEL PAC), and GIBSON, THOMAS as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1959 Decided by a vote of 6-0 to: (1) make a final determination that AON CORPORATION POLITICAL ACTION COMMITTEE, and HAGY, PAUL as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2)

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send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1960 Decided by a vote of 6-0 to: (1) make a final determination that BAKERY CONFECTIONERY TOBACCO WKRS & GRAIN MILLERS INT'L UNION LOCAL 19 POL ORG 'BCTGM', and EDWARD, THOMAS as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#1974 Decided by a vote of 6-0 to: (1) make a final determination that LOUISIANA REFORM PAC, and SCHMIDT, JOHN C as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#1980 Decided by a vote of 6-0 to: (1) make a final determination that NORTH CAROLINA FARM BUREAU FEDERATION INC POL ACT CMTE INC (AKA) NC FARM BUREAU FARMPAC, and PHILPOTT, H. JULIAN JR. as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#1982 Decided by a vote of 6-0 to: (1) make a final determination that PORTLAND CEMENT ASSOCIATION INC. PCA PAC, and RICHARD C. CREIGHTON MR. as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1983 Decided by a vote of 6-0 to: (1) make a final determination that PUBLIC SERVICE COMPANY OF NEW MEXICO RESPONSIBLE CITIZENS GROUP, and SATEGNA, THOMAS MR. as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1984 Decided by a vote of 6-0 to: (1) make a final determination that REGIONS FINANCIAL CORPORATION POLITICAL ACTION COMMITTEE, and BEAR, VIRGINIA as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1985 Decided by a vote of 6-0 to: (1) make a final determination that RETAIL, WHOLESALE & DEPARTMENT STORE UNION COMMITTEE ON POLITICAL EDUCATION (RWDSU COPE), and STUART H APPELBAUM as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1986 Decided by a vote of 6-0 to: (1) make a final determination that RICELAND FOODS, INC. PAC, and REED, BILL J. as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#1988 Decided by a vote of 6-0 to: (1) make a final determination that SOCIETY FOR VASCULAR SURGERY POLITICAL ACTION COMMITTEE, and ROBERT ZWOLAK DR. as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1989 Decided by a vote of 6-0 to: (1) make a final determination that SOCIETY OF INDEPENDENT GASOLINE MARKETERS OF AMERICA PAC, and ELAINE TALBOTT as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1990 Decided by a vote of 6-0 to: (1) make a final determination that ST. LOUISANS FOR BETTER GOVERNMENT, and SANDMEL, SHELDON as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1992 Decided by a vote of 6-0 to: (1) make a final determination that THE ASCAP LEGISLATIVE FUND FOR THE ARTS, and BOLTERS DORF, SUSAN as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1993 Decided by a vote of 6-0 to: (1) make a final determination that UNITED EMP PAC, CENTRAL LOUISIANA ELECTRIC CO. INC., and MELISSA LOHMAN as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1994 Decided by a vote of 6-0 to: (1) make a final determination that ZURICH HOLDING COMPANY OF AMERICA COMMITTEE FOR GOOD GOVERNMENT (Z-PAC), and BRADLEY, THOMAS A as treasurer, violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1965 Decided by a vote of 6-0 to: (1) make a final determination that COOPER INDUSTRIES POLITICAL ACTION COMMITTEE, and JOHNSON, TYLER W MR.

as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1987 Decided by a vote of 6-0 to: (1) make a final determination that RIGHT TRACK PAC, and HAL HYNEMAN as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1956 Decided by a vote of 6-0 to: (1) make a final determination that A DUDA & SONS, INC. POLITICAL ACTION COMMITTEE, and TRACY DUDA CHAPMAN as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1957 Decided by a vote of 6-0 to: (1) make a final determination that AMERICAN IRON AND STEEL INSTITUTE POLITICAL ACTION COMMITTEE (STEEL PAC), and GIBSON, THOMAS as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1959 Decided by a vote of 6-0 to: (1) make a final determination that AON CORPORATION POLITICAL ACTION COMMITTEE, and HAGY, PAUL as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#1960 Decided by a vote of 6-0 to: (1) make a final determination that BAKERY CONFECTIONERY TOBACCO WKRS & GRAIN MILLERS INT'L UNION LOCAL 19 POL ORG 'BCTGM', and EDWARD, THOMAS as treasurer , violated 2 U.S.C. 434(a) and assess the civil money penalty so indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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indicated; (2) send the appropriate letter. Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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Attest:

June 1, 2009
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 9, 2009

Elizabeth R. Greene as Treasurer
NAIOP-PAC
2201 Cooperative Way 3rd Floor
Herndon, VA 20171

C00233304
AF#: 1977

Dear Ms. Greene:

On March 31, 2009, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that NAIOP-PAC and you as treasurer violated 2 U.S.C. § 434(a) for filing late or failing to file the 2008 Pre-General Report. By letter dated April 6, 2009, the Commission sent you notification of the RTB finding that included a civil money penalty calculated at the RTB stage of \$600 in accordance with the schedule of penalties at 11 C.F.R. § 111.43.

On May 6, 2009, the FEC received payment of your civil money penalty calculated at the RTB stage. The FEC made a final determination on June 1, 2009 that you as treasurer and NAIOP-PAC violated 2 U.S.C. § 434(a), assessed a civil money penalty in the amount of \$600 in accordance with 11 C.F.R. § 111.43, and voted to close the file.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this 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 thirty (30) days from the date of the Commission's notification, this could occur at anytime following certification of the Commission's vote.

If you have any questions regarding this matter, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in cursive script, reading "Steven T. Walther".

Steven T. Walther
Chairman

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QUALITY IS OUR PRIORITY FOR LOCKBOX 9058
SEQ# 002 \$ 000060000 BA# 1 05-05-09 20 4



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|---|--|--|--|--|---------------|
| | | UNITED BANK A Subsidiary of United Bankshares, Inc. | | 68-444 550 | 093978 |
| Six Hundred and 00/100 Dollars | | | | | |
| PAY TO THE ORDER OF | | DATE | | CHECK NO. | AMOUNT |
| FEDERAL ELECTIONS COMMISSION PO BOX 979058 ST. LOUIS, MO 63197-9000 | | 4/21/2009 | | 093978 | \$*****600.00 |
| | | | | <i>Shirley A. McElroy</i> <i>Thomas J. Bisognin</i> | |

FOR: National Association of Industrial and Office Properties, Development PAC
(NAIOP-PAC)

FEC ID#: C00233304

AF#: 1977

PAYMENT DUE DATE: May 10, 2009

PAYMENT AMOUNT DUE: \$600

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12C N



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 1977

DATE SCANNED 7/16/09

SCANNER NO. 2

SCAN OPERATOR EES

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