



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

John Mathis, Treasurer
Warrior PAC
P.O. Box 83424
Baton Rouge, Louisiana 70884

DEC 18 2018

RE: MUR 7436
Warrior PAC

Dear Mr. Mathis:

On December 17, 2018, the Federal Election Commission accepted the signed conciliation agreement submitted on Warrior PAC's behalf in settlement of a violation of 52 U.S.C. § 30104(g), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. Please be advised that the civil penalty in this agreement reflects unusual factors brought forth during the investigation.

Documents related to the case will be placed on the public record within 30 days. *See Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016).* Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See 52 U.S.C. § 30109(a)(4)(B).*

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1548.

Sincerely,

A handwritten signature in black ink that reads "Elena Paoli".

Elena Paoli
Attorney

Enclosure
Conciliation Agreement

OFFICE OF
GENERAL COUNSEL
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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2018 NOV 02 AM 2: 07

MUR 7436

Warrior PAC and John Mathis in his
official capacity as treasurer

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Warrior PAC and its treasurer¹ (the "Committee" or "Respondents") violated 52 U.S.C. § 30104(g).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. The Committee is an independent-expenditure-only political committee that registered with the Commission in June 2016.

2. John Mathis is the treasurer of the Committee.

¹ In an amended Statement of Organization filed August 26, 2018, the Committee replaced the prior treasurer with John Mathis.

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3. The Federal Election Campaign Act of 1971, as amended (“Act”) provides that political committees registered with the Commission must file periodic reports disclosing their receipts and disbursements. 52 U.S.C. § 30104(a).

4. An independent expenditure (“IE”) is an expenditure that expressly advocates the election or defeat of a clearly identified federal candidate, and is not made in concert or cooperation with or at the request or suggestion of such candidate, the candidate’s authorized political committee, or their agents. 52 U.S.C. § 30101(17); *see also* 11 C.F.R. § 100.22(a), (b). In addition to a political committee’s regular reporting obligations, the Act further requires additional independent expenditure reporting within 24 hours of the expenditure when a person makes or contracts to make independent expenditures aggregating \$1,000 or more after the 20th day but more than 24 hours before the date of an election. *See* 52 U.S.C. § 30104(g); 11 C.F.R. § 109.10(d). Further, a political committee that makes or contracts to make independent expenditures aggregating \$10,000 or more outside of that 20-day period, up to and including the 20th day, must file a report describing those expenditures within 48 hours. 52 U.S.C. § 30104(g)(2); 11 C.F.R. § 104.4(b)(2). These reports must be filed within 48 hours “following the date on which a communication that constitutes an independent expenditure is publicly distributed or otherwise publicly disseminated.” 11 C.F.R. § 104.4(b), (c).

5. In 2016, the 20-day period for the Louisiana general election began on October 19; thus, an independent expenditure made by a political committee in connection with that election before that date aggregating \$10,000 or more needed to be additionally disclosed in a 48-Hour Report.

6. In its October 2016 Quarterly Report, the Committee disclosed on Schedule E that on September 17, it disseminated an IE supporting U.S. Senate candidate Robert L. Maness in

the Louisiana general election totaling \$108,662.38. That Report also disclosed another IE supporting Maness on September 19 totaling \$200,000. In its 12-Day Pre-General Report, the Committee disclosed disseminating an IE on October 12 totaling \$280,000 and another on October 16 totaling \$16,000, both also supporting Maness.

7. On February 9, 2017, the Reports Analysis Division sent the Committee Requests for Additional Information regarding both reports for failing to file corresponding 48-Hour Reports disclosing the IEs noted above. In response, the Committee filed late 48-Hour Reports on February 15 and March 14, 2017.

8. Respondents violated 52 U.S.C. § 30104(g) by failing to timely file four 48-Hour Reports of Independent Expenditures.

V. Respondents will take the following actions:

1. In ordinary circumstances, the Commission would seek a substantially higher civil penalty based on the violations outlined in this agreement. However, the Commission is taking into account that the Committee requested to terminate on January 10, 2017, has no cash, and contends that it cannot raise additional funds. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Five Thousand Dollars (\$5,000) pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Respondents will cease and desist from committing violations of 52 U.S.C. § 30104(g).

VI. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

VIII. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

IX. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lisa J. Stevenson
Acting General Counsel

BY: Kathleen M. Guith
Kathleen M. Guith
Associate General Counsel
for Enforcement

12-18-18
Date

FOR THE RESPONDENTS:

John Mathis
Name: John Mathis
Position: Treasurer, Warrior PAC

10/31/2018
Date