

22L-26

REPORTS ANALYSIS DIVISION REFERRAL  
TO  
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: December 13, 2022

ANALYST: Clyde Hinton

I. COMMITTEE:

Sagebrush Rebellion PAC  
C00792358  
Catharine Porter O'Neill, Treasurer  
301 Thelma Drive  
#202  
Casper, WY 82609

II. RELEVANT STATUTE:

52 U.S.C. § 30104 (g)(1)  
11 CFR § 104.4(c)

III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)**

Sagebrush Rebellion PAC (“the Committee”) failed to timely file three (3) 24-Hour Reports totaling \$79,824.15 to support six (6) independent expenditures disclosed on the 2022 July Quarterly Report, made after the 20<sup>th</sup> day but more than 24 hours before the day of the 2022 South Carolina Primary election held on June 14, 2022 (Attachment 1).

On July 13, 2022, the Committee filed the [2022 July Quarterly Report](#) covering the period from April 1, 2022, through June 30, 2022. The report included a [Schedule E \(Itemized Independent Expenditures\)](#) disclosing six (6) independent expenditures, totaling \$79,824.15, made in support and opposition of two (2) federal candidates.

On August 9, 2022, a [Request For Additional Information \(RFAI\)](#) was sent to the Committee referencing the 2022 July Quarterly Report. The RFAI noted that the Committee may have failed to file one (1) or more of the required 24-Hour Reports of independent expenditures. A chart was included with the RFAI identifying six (6) independent expenditures, totaling \$79,824.15, for which 24-Hour Reports had not been filed.

On October 6, 2022, the Committee filed one (1) [24-Hour Report](#) to support two (2) independent expenditures, totaling \$8,000, disseminated on May 31, 2022 and June 2, 2022. The independent expenditures included in this report match the independent expenditures questioned as missing on the RFAI referencing the 2022 July Quarterly Report. On the same day, October 6, 2022, the Committee filed one (1) [24-Hour Report](#) to support two (2) independent expenditures, totaling \$41,946.65, disseminated on June 2, 2022. The independent expenditures included in this report match the independent expenditures questioned as missing on the RFAI referencing the 2022 July Quarterly Report. Additionally, on October 6, 2022, the Committee filed one (1) [24-Hour Report](#) to support two (2) independent expenditures, totaling \$29,877.50, disseminated on June 6, 2022. The independent expenditures included in this report match the independent expenditures questioned as missing on the RFAI referencing the 2022 July Quarterly Report.

Also, on October 6, 2022, the Committee filed an [FEC Form 99](#) (Miscellaneous Electronic Submission) in response to the RFAI referencing the 2022 July Quarterly Report. The Committee stated:

“We ask that you accept the Forms 24 filed today by the Sagebrush Rebellion PAC. After the former Treasurer resigned for another job, a new treasurer was retained, along with a Bookkeeper. The new Treasurer became unavailable for medical reasons, and was not aware of either the RFAI or any communications from the FEC until today. Counsel for the PAC became aware of the late reports today, and the committee immediately began rectifying the situation. All late reports have now been filed.”

Since September 16, 2022, RAD logged eight (8) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act. RAD was able to connect with the Committee on three (3) of these occasions and notified Bill Constantine, a representative of the Committee, that the Committee would be referred to another Commission office for further review. RAD advised the Committee to file an FEC Form 99 with any clarifying information for the public record (Attachment 2). To date, no further communications have been received from the Committee regarding this matter.

Filings and correspondence related to the Committee can be found here: [Sagebrush Rebellion PAC](#).

**Sagebrush Rebellion PAC (C00792358)**  
2022 July Quarterly Report

24-Hour Reports Not Timely Filed

<b>Name of Payee</b>	<b>Date of Dissemination (Schedule E)</b>	<b>Expenditure Amount</b>	<b>Candidate Supported / Opposed</b>	<b>Election</b>	<b>24-Hour Report Filed</b>
AZ Media Group	5/31/2022	<b>\$4,000.00</b> <i>24-Hour Report Required</i>	MARK BURNS	2022 SC Primary (6/14/22)	10/6/2022
AZ Media Group	6/2/2022	<b>\$4,000.00</b> <i>24-Hour Report Required</i>	WILLIAM R TIMMONS IV	2022 SC Primary (6/14/22)	10/6/2022
Spectrum Reach Internetad	6/2/2022	<b>\$20,973.35</b> <i>24-Hour Report Required</i>	MARK BURNS	2022 SC Primary (6/14/22)	10/6/2022
Spectrum Reach Internetad	6/2/2022	<b>\$20,973.35</b> <i>24-Hour Report Required</i>	WILLIAM R TIMMONS IV	2022 SC Primary (6/14/22)	10/6/2022
WSPA - TV	6/6/2022	<b>\$14,938.75</b> <i>24-Hour Report Required</i>	MARK BURNS	2022 SC Primary (6/14/22)	10/6/2022
WSPA - TV	6/6/2022	<b>\$14,938.75</b> <i>24-Hour Report Required</i>	WILLIAM R TIMMONS IV	2022 SC Primary (6/14/22)	10/6/2022