



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 19, 2019

HILARY ROSEN, TREASURER
L PAC
2120 L ST NW SUITE 850
WASHINGTON, DC 20037

Response Due Date
10/24/2019

IDENTIFICATION NUMBER: C00519413

REFERENCE: MID-YEAR REPORT (01/01/2019 - 06/30/2019)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 item(s):

1. Schedule A supporting Line 15 of your report discloses an offset to an operating expenditure(s) totaling \$9,000 from "Blue Parasol Group, LLC"; however, your report(s) does not appear to disclose a disbursement to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary. (11 CFR § 104.3(a) & (b))
2. Schedule A supporting Line 17 (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 52 U.S.C. §30116(f) (formerly 2 U.S.C. §441a(f)) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year. However, Commission records indicate that your Committee maintains a Non-Contribution Account consistent with the stipulated judgment in Carey v. FEC.

If the apparently excessive contribution(s) in question was deposited into your Non-Contribution Account, please amend your report to disclose the item on Schedule A supporting Line 17 of the Detailed Summary Page and disclose "Non-Contribution Account" in the description field or in memo text. For more information please reference the "Reporting Guidance for Political Committees that Maintain and Non-Contribution Account" at <http://classic.fec.gov/pages/fecrecord/november2011/fecstatementcareyvfec.shtml>

L PAC

Page 2 of 3

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund, transfer to a non-federal account and/or reattribution) for each contribution. The committee should retain for its records copies of refund checks, transfers to nonfederal account, and/or letters reattributing the contributions in question. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

3. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Consulting Work" and "Fundraising." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published

L PAC

Page 3 of 3

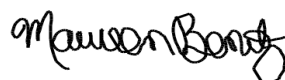
in the Federal Register can be found at <https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>

4. Schedule B of your report discloses reimbursements to individuals for "Reimbursement." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §§104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1147.

Sincerely,



Maureen Benitz
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

**Apparent Impermissible, Excessive, and Prohibited Contributions
L PAC (C00519413)**

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Report
Laguens, Dawn	2/27/19	\$5,000.00	2019 Mid-Year
Laguens, Dawn	4/11/19	\$500.00	2019 Mid-Year
Laguens, Dawn	5/11/19	\$500.00	2019 Mid-Year
Laguens, Dawn	6/11/19	\$500.00	2019 Mid-Year
Ricketts, Laura	1/16/19	\$5,000.00	2019 Mid-Year
Ricketts, Laura	1/16/19	\$45,000.00	2019 Mid-Year
Ritchie, Alix L	1/28/19	\$5,000.00	2019 Mid-Year
Ritchie, Alix L	1/28/19	\$47,000.00	2019 Mid-Year
Rosen, Hilary	4/30/19	\$5,000.00	2019 Mid-Year
Rosen, Hilary	4/30/19	\$15,000.00	2019 Mid-Year
Weiner, Shari L	3/8/19	\$5,000.00	2019 Mid-Year
Weiner, Shari L	3/8/19	\$500.00	2019 Mid-Year