



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

March 4, 2020

ROSHAN PATEL, TREASURER  
DLGA PAC  
1090 VERMONT AVENUE, NW SUITE 750  
WASHINGTON, DC 20005

**Response Due Date**  
**04/08/2020**

IDENTIFICATION NUMBER: C00685719

REFERENCE: JULY QUARTERLY REPORT (04/01/2019 - 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 3 item(s):

1. Schedule A supporting Line 17 (see attached) discloses a receipt(s) from an organization(s) that is not registered with the Commission. 52 U.S.C. §30118 (formerly 2 U.S.C. §441b) prohibits the receipt of funds from national banks, corporations, and labor organizations. However, Commission records indicate that your Committee maintains a Non-Contribution Account consistent with the stipulated judgment in Carey v. FEC.

If the amounts in question were deposited into your Committee's 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 <https://www.fec.gov/updates/fec-statement-on-carey-v-fec/>

If you have received a prohibited contribution, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited 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, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

Please inform the Commission of your corrective action promptly by providing

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the date and method of your remedy (refund or transfer to a non-federal account) for each contribution. The committee should retain for its records copies of refund checks and transfers to nonfederal account for the contributions in question. In addition, 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 concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

2. Schedule B of your report discloses reimbursements to individuals for "Reimbursement: Event Catering & Facilities - IE Account." 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

3. Schedule B discloses reimbursements to individuals for "Reimbursement: Travel Expenses - IE Account," and "Reimbursements: Event Travel, Catering & Facilities - IE Account." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by individuals to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the calendar year, the individual advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

**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

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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 information about the report review process or specific filing information for your committee type, please visit [www.fec.gov/help-candidates-and-committees](http://www.fec.gov/help-candidates-and-committees). For more information about Requests for Additional Information (RAI), why you received a letter, and how to respond, please visit [www.fec.gov/help-candidates-and-committees/request-additional-information](http://www.fec.gov/help-candidates-and-committees/request-additional-information). Should you 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) 694-1157.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Chamorro', with a horizontal line extending to the left and a vertical line extending upwards from the middle.

Andrea Chamorro  
Campaign Finance Analyst  
Reports Analysis Division

**Apparent Impermissible, Excessive, and Prohibited Contributions  
DLGA PAC (C00685719)**

**Contributions from Possible Prohibited Entities (Corporations, Labor Organization, LLCs)**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
Adroit Health Group LLC	5/16/19	\$10,000.00	2019 July Quarterly
Alliant Energy Corp Services	4/3/19	\$25,000.00	2019 July Quarterly
America's Insurance Plans	6/13/19	\$10,000.00	2019 July Quarterly
American Fuel & Petroleum Manufacturers	4/3/19	\$10,000.00	2019 July Quarterly
AstraZeneca Pharmaceuticals	4/29/19	\$25,000.00	2019 July Quarterly
Comprehensive Health Management Inc.	4/29/19	\$10,000.00	2019 July Quarterly
GlaxoSmithKline	4/3/19	\$10,000.00	2019 July Quarterly
Great Lakes Dredge & Dock Company LLC	4/29/19	\$10,000.00	2019 July Quarterly
NARAL Pro Choice America	4/29/19	\$2,500.00	2019 July Quarterly
National Association of Home Builders	4/10/19	\$10,000.00	2019 July Quarterly
Nuclear Energy Institute	4/12/19	\$5,000.00	2019 July Quarterly
Planned Parenthood Action Fund	6/27/19	\$25,000.00	2019 July Quarterly
Tonio Burgos & Associates	6/13/19	\$5,000.00	2019 July Quarterly
United Services Automobile Association	4/3/19	\$25,000.00	2019 July Quarterly