



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 24, 2012

ROBERT B. THOMSON III, TREASURER
AMERICAN EXPRESS COMPANY POLITICAL
ACTION COMMITTEE (AXPPAC)
801 PENNSYLVANIA AVE. NW SUITE 650
WASHINGTON, DC 20004

Response Due Date
10/29/2012

IDENTIFICATION NUMBER: C00040535

REFERENCE: JULY MONTHLY REPORT (06/01/2012 - 06/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 1 item(s):

- Schedule A of your report (see attached) discloses a contribution from an individual(s) who have a mailing address outside of the United States of America. Please be advised that 2 U.S.C. §441e(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 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 on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

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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. 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) 694-1133.

Sincerely,



Christopher Morse
Senior Campaign Finance Analyst
Reports Analysis Division

Prohibited, and Impermissible Contributions
American Express Company Political Action Committee (AXPPAC) (C00040535)

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
Raymond D. Joabar	6/1/12	\$30.00	2012 July Monthly
Raymond D. Joabar	6/15/12	\$30.00	2012 July Monthly
Raymond D. Joabar	6/29/12	\$30.00	2012 July Monthly
John C. Steward	6/21/12	\$5,000.00	2012 July Monthly