



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 9, 2016

BRENDA L. SKIDMORE, TREASURER
SUNTRUST PAC
919 E MAIN STREET
RICHMOND, VA 23219

Response Due Date

12/14/2016

IDENTIFICATION NUMBER: C00386524

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2016 - 09/30/2016)

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 B supporting Line 23 of your report discloses contributions to several federal candidates designated for both the "General 2011" and "2016 General" elections. These candidates did not participate in an election in 2011. Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR § 110.1(b)(3) and 110.2(b)(3)) Contributions not designated for a valid election will be attributed to the next election for Federal office in which the candidate is participating. (11 CFR §§ 110.1(b)(2) and 110.2(b)(2)) Please amend your report to clarify which election these contributions were made for.
2. On Schedule B, you have disclosed disbursements to a federal candidate(s). Commission regulations require that these itemized disbursements include the recipient's full name, complete address, date, amount, state of election, office sought (House, Senate, or President), and district (if applicable). Please amend your report to include the state of election. (11 CFR §104.3 (b)(3))
3. Schedule B supporting Line 23 discloses one or more contributions to a candidate(s) for the 2011 General election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election

SUNTRUST PAC

Page 2 of 3

campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b) (1) and (3))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

- For your information and consideration for future filings, Schedule B supporting Line 23 of your report discloses a contribution(s) to "Friends of Pat Toomey" designated for "General 2011". However, it appears this candidate(s) did not participate in the election(s) indicated. Contributions not designated for a valid election will be attributed to the next election for Federal office in which the candidate is participating. (11 CFR §§ 110.1(b)(2) and 110.2(b)(2)) For future filings, please include valid election designation(s) if applicable.

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

SUNTRUST PAC

Page 3 of 3

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 the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1157.

Sincerely,

A handwritten signature in black ink that reads "Laura E. Sinram". The signature is written in a cursive style with a large initial "L" and "S".

Laura Sinram
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Impermissible, Excessive, and Prohibited Contributions
SUNTRUST PAC (C00386524)

Contributions Made After Election Date

Recipient Name	Date	Amount	Election	Election (State-Date)
Friends of Jeb Hensarling	9/28/16	\$5,000.00	*G2012	TX - 11/6/12
Mulvaney For Congress	9/28/16	\$5,000.00	*G2012	SC - 11/6/12

*Schedule B of your report discloses this contribution as designated to the 2011 General election; however, this candidate did not participate in a General election in 2011. Therefore, this contribution has been attributed to the next scheduled Federal election for this candidate, the 2012 General election (11 CFR §110.2(b)(ii)).