



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 27, 2022

BRIAN FOUCART, TREASURER
NATIONAL DEMOCRATIC TRAINING COMMITTEE
PAC
PO BOX 65322
WASHINGTON, DC 20035

Response Due Date
06/01/2022

IDENTIFICATION NUMBER: C00603084

REFERENCE: FEBRUARY MONTHLY REPORT (01/01/2022 - 01/31/2022)

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 B supporting Line 21(b) discloses a disbursement to a credit card company totaling \$17,461.32. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, you must itemize the name of the original vendor, address, date, amount, and purpose as a memo entry as well as clearly identify the credit card payment to which each memo entry relates. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR § 104.9)
2. 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: "Blessitt Shawn Consulting, LLC." 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 in the Federal Register can be found at <https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>

3. Schedule B of your report discloses reimbursements to individuals for "Reimbursement; Supplies." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the

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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

4. On Schedule B supporting Line 29, you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information. (11 CFR § 104.3(b)(3))

- For your information and consideration when preparing future filings, political committees that have established a federal account and a non-contribution account consistent with the stipulated order in Carey v. FEC should report their activity according to the Commission's interim reporting guidance after notifying the Commission of their intent to do so.

Committee's using a separate non-contribution account should (1) deposit the contributions into a separate bank account for the purpose of financing independent expenditures, other advertisements that refer to a Federal candidate, and generic voter drives, (2) ensure the non-contribution account remain segregated from any accounts that receive source-restricted and amount-limited contributions for the purpose of making contributions to candidates, and (3) ensure each account pay a percentage of administrative expenses that closely corresponds to the percentage of activity for that account.

Receipts and disbursements for each account must be reported pursuant to 52 U.S.C. §30104 and 11 CFR Part 104. Receipts deposited into the non-contribution account should be reported on Schedule A supporting Line 17 with **"Non-Contribution Account" disclosed in Memo Text** or the description field.

Independent Expenditures paid from the non-contribution account should be disclosed on Schedule E supporting Line 24 with "Non-Contribution Account" disclosed in Memo Text or the description field with the purpose of disbursement.

All other disbursements made from the non-contribution account should be reported on Schedule B, supporting Line 29 with **"Non-Contribution Account" disclosed in Memo Text** or the description field with the purpose of disbursement.

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For more information please see the Commission's interim reporting guidance at <https://www.fec.gov/updates/fec-statement-on-carey-v-fec>.

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 information about the report review process or specific filing information for your committee type, please visit 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. 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) 694-1172.

Sincerely,



Jack Baisden

Sr. Campaign Finance & Reviewing Analyst