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May 15, 2024

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Response Due Date 06/20/2024

IDENTIFICATION NUMBER: C00685719

REFERENCE: YEAR-END REPORT (07/01/2023 - 12/31/2023)

## 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 2 item(s):

- 1. Schedule B supporting Line 21(b) of the Detailed Summary Page discloses \$8,988.80 in activity identified as MEMO entries that do not appear to correspond with any itemized transaction(s). Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is not included in the total receipts or disbursements for the report. Please amend your report to provide clarifying information regarding this activity. (11 C.F.R. § 104.3(a) and (b))
- **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 the Detailed Summary Page to clarify the following description(s): "Non-Contribution Account. In-Kind PAC Event Expenses."

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

- Schedule A supporting Line 11(a)(i) of the Detailed Summary Page discloses one or more contributions totaling \$50,000 from "Magna," \$40,000 from "Spark Therapeutics," and \$50,000 from "Centene," which appear to be corporations...

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However, you have also disclosed "Non-Contribution Account" for these contributions. For your information and consideration when preparing future your Committee's Non-Contribution filings. contributions deposited into Account should be properly disclosed on a separate Schedule A, supporting Line 17 of the Detailed Summary Page, with "Non-Contribution Account" disclosed in the description field or in memo text. Please refer to the "Reporting Guidance for Political Committees that Maintain a Non-Contribution Account" https://www.fec.gov/updates/fec-statement-on-carey-v-fec when determining the proper categorization(s) for your next filing.

- Schedule B supporting Line 21(b) of the Detailed Summary Page discloses one or more disbursement(s) for apparent operating expenditures. However, you have also disclosed "Non-Contribution Account" for this disbursement(s). For your information and consideration when preparing future filings, please be advised that administrative and other expenditures made from the Non-Contribution account should be properly disclosed on Schedule B supporting Line 29 with "Non-Contribution Account" in memo text or the description filed with the purpose of disbursement. Please refer to the "Reporting Guidance for Political Committees that Maintain Non-Contribution Account" a https://www.fec.gov/updates/fec-statement-on-carey-v-fec when determining the proper categorization(s) for your next filing.

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 (RFAI), 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) 694-1157.

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Sincerely,

Andrea M Chamorro

Sr. Campaign Finance & Reviewing Analyst

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