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May 7, 2020

HILARY ROSEN, TREASURER L PAC 2120 L ST NW SUITE 850 WASHINGTON, DC 20037

Response Due Date 06/11/2020

IDENTIFICATION NUMBER: C00519413

REFERENCE: APRIL QUARTERLY REPORT (01/01/2020 - 03/31/2020)

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 1 item(s):

- 1. Schedule B supporting Line 21(b) of your report discloses \$15,720.88 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))
- 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.

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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

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 (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) 694-1147.

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Sincerely,

Maureen Benitz

Sr. Campaign Finance & Reviewing Analyst

Reports Analysis Division

on James Bones

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