



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

October 25, 2023

CYNTHIA LEIGH APPLEBAUM, TREASURER
SINEMA FOR ARIZONA
PO BOX 7586
PHOENIX, AZ 85011

Response Due Date
11/29/2023

IDENTIFICATION NUMBER: C00508804

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2023 - 09/30/2023)

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 1 item(s):

- Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for some of these contributions.

An individual or a political committee other than an authorized committee or a qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$3,300 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR §§ 110.1(b), (e) and (k), and 102.13(c))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

Please be reminded that all refunds, redesignations and reattributions must be made within 60 days of receipt of the contribution. To date, one or more of the

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apparent excessive contributions have not been refunded, redesignated, or reattributed.

For reattributions, the funds can be retained if, within 60 days of receipt, the excessive amount was properly reattributed to another person. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor who signed the check an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount was properly designated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) the committee redesignates by presumption the excessive portion of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) A contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt, the excessive amount must be refunded. (11 CFR § 103.3(b)(1))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/ or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period

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in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund or redesignate and/or reattribute the excessive amount will be taken into consideration.

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) 694-1171.

Sincerely,



Jessica Grainger

Sr. Campaign Finance & Reviewing Analyst

**Apparent Excessive, Prohibited, and Impermissible Contributions
Sinema for Arizona (C00508804)**

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Arriola, Benjamin	9/19/21	\$2,900.00	P2024
Arriola, Benjamin	9/8/23	\$2,000.00	P2024
Benton, Daniel	6/20/21	\$2,900.00	P2024
Benton, Daniel	9/27/23	\$800.00	P2024
Bidwill, Michael J.	4/26/19	\$1,000.00	P2024
Bidwill, Michael J.	9/21/23	\$5,600.00	P2024
Bidwill, Michael J.	9/21/23	-\$3,300.00	P2024
Bidwill, Michael J.	9/26/23	\$1,000.00	P2024
Billingsley, Lucy	3/31/22	\$2,900.00	P2024
Billingsley, Lucy	8/8/23	\$2,000.00	P2024
Booth, Lynn	3/13/22	\$2,900.00	P2024
Booth, Lynn	8/29/23	\$1,600.00	P2024
Brandmeyer, Michael	12/31/19	\$2,800.00	P2024
Brandmeyer, Michael	6/27/21	\$2,900.00	P2024
Brandmeyer, Michael	6/26/23	-\$3,400.00	P2024
Brandmeyer, Michael	9/9/23	\$1,600.00	P2024
Brierley, Harold	8/8/21	\$2,900.00	P2024
Brierley, Harold	8/26/23	\$6,600.00	P2024
Brierley, Harold	8/26/23	-\$3,300.00	P2024
Chapman, Stuart	12/31/20	\$500.00	P2024
Chapman, Stuart	6/30/21	\$2,400.00	P2024
Chapman, Stuart	9/30/23	\$1,000.00	P2024
Chapman, Stuart	9/30/23	-\$400.00	P2024
Donohue, Craig	3/13/22	\$1,400.00	P2024
Donohue, Craig	8/31/23	\$2,200.00	P2024
Donohue, Elsa	3/13/22	\$2,900.00	P2024
Donohue, Elsa	9/10/23	\$800.00	P2024
Drake, Stephen	3/20/22	\$2,900.00	P2024

**Apparent Excessive, Prohibited, and Impermissible Contributions
Sinema for Arizona (C00508804)**

Drake, Steve	9/21/23	\$3,300.00	P2024
Faust, Marcus G.	1/23/19	\$2,000.00	P2024
Faust, Marcus G.	10/4/20	\$800.00	P2024
Faust, Marcus G.	3/14/21	\$100.00	P2024
Faust, Marcus G.	8/28/23	\$600.00	P2024
Guldner, Jeff	1/16/22	\$2,900.00	P2024
Guldner, Jeff	9/14/23	\$6,600.00	P2024
Guldner, Jeff	9/14/23	-\$3,300.00	P2024
Guldner, Jeff	5/12/22	\$2,900.00	G2024
Guldner, Jeff	9/14/23	\$3,300.00	G2024
Hickman, Glenn M.	2/23/21	\$1,100.00	G2024
Hickman, Glenn M.	3/1/23	\$320.00	G2024
Hickman, Glenn M.	4/1/23	\$320.00	G2024
Hickman, Glenn M.	4/1/23	\$360.00	G2024
Hickman, Glenn M.	5/1/23	\$360.00	G2024
Hickman, Glenn M.	6/1/23	\$360.00	G2024
Hickman, Glenn M.	7/1/23	\$360.00	G2024
Hickman, Glenn M.	8/1/23	\$360.00	G2024
Hickman, Glenn M.	9/1/23	\$80.00	G2024
Klein, Howard B.	3/31/22	\$2,900.00	P2024
Klein, Howard B.	9/5/23	\$3,300.00	P2024
Levy, Michael	1/24/22	\$2,900.00	P2024
Levy, Michael	8/28/23	\$3,300.00	P2024
Malloy, Michael	12/5/21	\$2,500.00	P2024
Malloy, Mike	9/25/23	\$3,300.00	P2024
McIntyre, David J. Jr.	2/28/19	\$2,700.00	P2024
McIntyre, David J. Jr.	4/16/19	\$100.00	P2024
McIntyre, David J. Jr.	5/2/21	\$100.00	P2024
McIntyre, David J. Jr.	9/24/23	\$800.00	P2024
Nolan, Peter	3/20/22	\$2,000.00	P2024
Nolan, Peter	9/28/23	\$2,000.00	P2024

**Apparent Excessive, Prohibited, and Impermissible Contributions
Sinema for Arizona (C00508804)**

Pascua Yaqui Tribe	6/30/21	\$2,900.00	P2024
Pascua Yaqui Tribe	9/30/23	-\$400.00	P2024
Pascua Yaqui Tribe	9/30/23	\$3,300.00	P2024
Peykoff, Andy II	8/12/22	\$2,900.00	P2024
Peykoff, Andy II	9/1/23	-\$3,300.00	P2024
Peykoff, Andy II	9/1/23	\$5,000.00	P2024
Simmons, L E	9/1/23	\$3,300.00	P2024
Simmons, Le	9/19/23	\$3,300.00	P2024
Tanner, Dallas	4/25/21	\$2,900.00	P2024
Tanner, Dallas	8/23/23	\$3,100.00	P2024
Troop, Cynthia	3/20/22	\$2,000.00	P2024
Troop, Cynthia	9/14/23	\$1,500.00	P2024
Zemel, Barry	8/19/19	\$1,000.00	P2024
Zemel, Barry	3/31/21	\$1,000.00	P2024
Zemel, Barry	3/9/23	\$500.00	P2024
Zemel, Barry	9/13/23	\$2,000.00	P2024

Apparent Excessive Contributions from Committees

Contributor Name	Date	Amount	Election
Thrivent Financial for Lutherans PAC	9/10/20	\$2,500.00	P2024
Thrivent Financial for Lutherans PAC	9/30/20	\$1,500.00	P2024
Thrivent Financial for Lutherans PAC	6/8/23	\$1,000.00	P2024
Thrivent Financial for Lutherans Political Action Committee	9/11/23	\$1,500.00	P2024