

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

May 23, 2014

M. IQBAL BHOLAT, TREASURER CALIFORNIA REAL ESTATE POLITICAL ACTION COMMITTEE/FEDERAL -CALIFORNIA ASSOCIATION OF REALTORS 525 S. VIRGIL AVE. LOS ANGELES, CA 90020

Response Due Date 06/27/2014

IDENTIFICATION NUMBER: C00083279

REFERENCE: APRIL QUARTERLY REPORT (01/01/2014 - 03/31/2014)

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  $\underline{1}$  item(s):

- Your report discloses a reimbursement(s) for "REIMBURSEMENT FOR FUNDRAISING EVENT," "REIMBURSEMENT FOR FUNDRAISING EXPENSE" and "REIMBURSEMENT FOR FUNDRAISING EXPENSES" to "GREATER ANTELOPE VALLEY ASSOCIATION OF REALTORS," "SOUTH BAY ASSOCIATION OF REALTORS," "CITRUS VALLEY ASSOCIATION OF REALTORS," "SACRAMENTO ASSOCIATION OF REALTORS" and "SOLANO ASSOCIATION OF REALTORS", apparent unregistered organizations. This appears to be an in-kind contribution made on behalf of your committee, as the <u>original</u> payment for the goods and services has been made by an entity other than your committee. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, salaries, telephone service, office equipment and supplies.

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), unaffiliated political committee, or any other entity would be considered an in-kind contribution from that person, committee or entity, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 C.F.R. §104.3, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

## CALIFORNIA REAL ESTATE POLITICAL ACTION COMMITTEE/FEDERAL - CALIFORNIA ASSOCIATION OF REALTORS

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Please clarify the reimbursement(s) for apparent administrative expenses made to these entities by your committee and provide the date(s) the goods/services were provided.

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.

<u>Electronic filers must file amendments (to include statements, designations and reports)</u> 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. 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,

Jaura E. Sinraño

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

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