



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 28, 2018

MIKE ADAMS, TREASURER
KEYSTONE VICTORY FUND
P.O. BOX 58746
PHILADELPHIA, PA 19102

Response Due Date
07/02/2018

IDENTIFICATION NUMBER: C00545830

REFERENCE: APRIL QUARTERLY REPORT (01/01/2018 - 03/31/2018)

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 enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule A (see attached) discloses a contribution(s) from an individual(s) who has a mailing address outside of the United States of America. Please be advised that 52 U.S.C. §30121(a) (formerly 2 U.S.C. §441e(a)) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR §110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual knowledge that the source of the funds solicited, accepted, or received is a

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foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 28 (a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution(s), prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

2. A review of the reports filed by your committee indicates that your committee received one or more contributions from "American Association For Justice PAC" which has not been disclosed on their report(s) of receipts and disbursements. Please clarify if the contribution(s) was received from the disclosed donor's federal account and amend your report(s) if necessary.

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 additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1393.

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Sincerely,

A handwritten signature in cursive script that reads "Sean Krieger". The signature is written in black ink and is positioned above the printed name and title.

Sean Krieger
Campaign Finance Analyst
Reports Analysis Division

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**Impermissible, Excessive, and Prohibited Contributions
Keystone Victory Fund (C00545830)**

Contributions from Possible Foreign Nationals

| Contributor Name | Date | Amount | Report |
|-------------------------|-------------|---------------|----------------------|
| Anthony, Annette | 1/31/18 | \$2,344.52 | 2018 April Quarterly |
| Clark, Lindsay | 2/1/18 | \$2,280.95 | 2018 April Quarterly |
| Levine, Ida | 1/28/18 | \$2,312.74 | 2018 April Quarterly |
| Sainty, Elizabeth | 3/8/18 | \$1,655.95 | 2018 April Quarterly |