



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 29, 2016

ANASTASIA AULT, TREASURER
FOUNDATION FOR A GREATER AMERICA,
INC.
P.O. BOX 3587
TUSTIN, CA 92781

Response Due Date
10/03/2016

IDENTIFICATION NUMBER: C00555862

REFERENCE: AMENDED MID-YEAR REPORT (01/01/2015 - 06/30/2015), RECEIVED
07/15/2016

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 3 item(s):

1. Your amended report discloses an increase in disbursements totaling \$66,042.36 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)

Although the Commission may take further legal action concerning this matter, your clarification and any additional clarification you may have will be taken into consideration. 11 CFR §104.3

2. Your report discloses a payment(s) on Schedule B to "Judson A Church" and "CrossClick Media" that has not been recorded on Schedule C. Loan Payments must also be reflected on Schedule C. Please amend your report to clarify this discrepancy. (52 U.S.C. §30104(b)(4) (formerly 2 U.S.C. §434(b)(4)))

3. Schedule C of your committee's report discloses loans from "CrosClick Media, Inc." and "Judson A. Church" with interest rates of 1,000% and 1,500%, respectively (see attached). Please be advised that the extension of credit by any person is a contribution unless the credit is extended in the ordinary course of the person's business and the terms are substantially similar

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to extensions of credit to nonpolitical debtors that are of similar risk and size of obligation. 11 CFR §100.55

If the interest rate(s) in question was incompletely or incorrectly reported, you must amend your report with the clarifying information. Although the Commission may take further legal action regarding these apparent prohibited contributions, any further clarifying information that you can provide will be taken into consideration. Please amend your report to include clarification regarding the interest rates for these loans.

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. 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) 694-1164.

Sincerely,



Nicole Miller
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Loans on Schedule C**FOUNDATION FOR A GREATER AMERICA, INC. (C00555862)**

Loan Source	Date Incurred	Original Amount	Interest Rate	Report
CrossClick Media, Inc.	1/6/15	\$5.00	1000%	2015 Mid-Year
CrossClick Media, Inc.	5/13/15	\$26,500.00	1000%	2015 Mid-Year
CrossClick Media, Inc.	5/13/15	\$19,000.00	1000%	2015 Mid-Year
CrossClick Media, Inc.	5/13/15	\$13,200.00	1000%	2015 Mid-Year
CrossClick Media, Inc.	6/3/15	\$10,600.00	1000%	2015 Mid-Year
Judson A. Church,	1/27/15	\$250,000.00	1500%	2015 Mid-Year