DISAVOWAL RESPONSE (FEC Form 99)

NAME OF COMMITTEE (In Full): Arnold & Porter Kaye Scholer LLP (APKS) Partners Political Action Committee

FEC IDENTIFICATION NUMBER: C00216895

Mailing Address: 601 Massachusetts Ave. NW

City	State	ZIP Code
Washington	DC	20001-3743

July 29, 2026

VIA FECFILE

Aaron Carrell
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission ('FEC')
Washington, DC 20463

Committee ID Number: C00216895

Reference: May Monthly Report (04/01/2026 - 04/30/2026)

Dear Mr. Carrell,

In response to your Request for Additional Information dated June 25, 2026 (the 'Request'), the Arnold & Porter Kaye Scholer LLP Partners PAC (the 'Committee' or the 'Partners PAC') respectfully submits the following clarifying information to the FEC. The Committee was the victim of fraud by a third party who stole valid checks that the Committee had written to campaigns, as explained further below. Although a criminal actor attempted to steal from the Committee, the Committee acted promptly to report the fraud to its bank and all funds were returned to the Committee's account. The return of the funds is reflected in the Committee's May FEC report.

On November 24, 2025, the Treasurer of the Partners PAC sent several checks addressed to a number of recipient political committees via the United States Postal Service ('USPS'). At least two of these checks apparently were intercepted in the mail, and a fraudulent actor or actors changed the information on the checks and attempted to deposit the checks. One of the intercepted checks was marked as 'Stop Payment' by the Partners PAC, which alerted the Committee's bank ('Truist Bank' or 'Truist') to the attempted fraud. It also seems that the same fraudulent actor or actors used the Committee's bank account number and routing number from the intercepted checks to initiate fraudulent payments to Discover Bank in mid-March. The money sent to Discover Bank and the funds related to the intercepted checks have now been returned in full to the Committee's account.

The Committee provides the following timeline of relevant events:

- On November 24, 2025, five checks were written and mailed to recipient committees via the USPS. All of the envelopes containing the checks were either placed in a blue mailbox in the Cleveland Park neighborhood of Washington, DC, or through the mail slot at the Cleveland Park U.S. Post Office.

- On January 12, 2026, the Committee discovered that at least one check, and possibly more, had not been received by the intended recipients. Upon further review, the Committee placed stop-payment requests against check numbers 3244 and 3288.

- When preparing the Partners PAC's March Monthly Report on Form 3X due on April 20, 2026, the Committee scrutinized two debits from its bank account dated March 16, 2026, described as payments to Discover Bank in the amounts of $2,500.00 and $200.00. Neither of these payments was an authorized transaction. The Treasurer called Truist Bank asking for more information on the two charges, but the bank representative could not provide any further details regarding the charges as of April 15, 2026. (This was later resolved through further follow-up discussions between Truist and the Committee, as detailed below.)

- On the morning of Friday, May 1, 2026, the Committee's Treasurer spoke with a representative from Truist Bank about

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two suspicious check deposits pending as of April 30, 2026.

o Check 3286 in the amount of $40,000.00.

+ The Committee's records show that this check number was originally written in November 2025, made payable to the Friends for Gregory Meeks committee (C00430991) in the amount of $1,000.00. In reviewing the FEC's online records, the Meeks campaign did not disclose receiving this contribution.

+ The fraudulently deposited check had been altered and was made payable to "Gleora Agoj" in the amount of $40,000.00 dated "13 March 26," with the words "Advisory Asistant [sic] fee" written on the memo line. The signature, which is not clearly legible, does not reflect the authorized signatures of the Committee's Treasurer or Assistant Treasurer as of November 2025 or March 2026.

o Check 3288 in the amount of $20,953.00.

+ The Committee's records show that this check number was originally written in November 2025, made payable to the American Mosaic PAC (C00694471) in the amount of $2,500.00. The Committee had placed a stop-payment order on this check on January 12, 2026.

+ Check 3288 was not honored or paid by Truist Bank.

- During the May 1, 2026, phone call with Truist Bank, the Committee's Treasurer confirmed that the two checks were fraudulent and should not be honored by the bank. The Truist representative told the Treasurer that the Committee's bank account would not be charged. However, the $40,000.00 for check 3286 was debited from the account on Thursday, April 30, 2026. As previously noted, check 3288 was not honored and no funds for this check were removed from the Committee's bank account.

- On the evening of May 1, 2026, Truist Bank reversed and re-deposited the $40,000.00 from the fraudulent deposit of check 3286 and both fraudulent debits ($2,500.00 and $200.00) to Discover Bank dated March 16, 2026.

In response to the fraudulent activity, the Committee enrolled its bank account in Truist's Fraud Inspector program. Through this program, the Committee receives an email every time a payment is debited from its bank account. The Committee reviews an image of each check presented for payment to ensure that the payee and amount are as approved by the Committee. If the Committee suspects fraudulent activity, it can dispute the item by 2pm ET to receive an automatic reversal. The Committee also submitted an incident report to the U.S. Postal Service stating that someone was stealing mail in the neighborhood. Further, the Committee now mails checks only by handing envelopes containing checks directly to a U.S. Postal Service employee through the dedicated mail room of the Committee's office building.

Finally, in response to the Request's second bullet point, the Committee submitted an amendment to its May Monthly Report on July 17, 2026. The amended report includes the missing information regarding state of election, office sought, and district information (if applicable) to certain disbursements listed on Schedule B. The Committee regrets that this information was not disclosed in the original filing.

Please feel free to contact me at (202) 942-5249 or Nicholas.Townsend@arnoldporter.com if you require any additional clarification regarding this fraudulent activity.

Sincerely,
/s/ Nicholas L. Townsend
Treasurer, Arnold & Porter Kaye Scholer LLP Partners PAC (C00216895)

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