



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 18, 2018

JAMES SCHWARTZ SR., TREASURER
STEVE CHABOT FOR CONGRESS
3030 HARRISON AVE.
CINCINNATI, OH 45211

Response Due Date
01/22/2019

IDENTIFICATION NUMBER: C00301838

REFERENCE: 30 DAY POST-GENERAL REPORT (10/18/2018 - 11/26/2018)

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 an audit or enforcement action.** Additional information is needed for the following 8 item(s):

1. Column B figures for the Summary and Post-Election Detailed Summary Page information should equal the sum of the Column B figures on your previous report and the Column A figures on this report minus the Column C figures. Please file an amendment to your report to correct the Column B discrepancies for Line(s) 6(a), 6(c), 11(a), 11(c), 11(e) and 1 and all subsequent report(s) that may be affected by this correction. Note that Column B should reflect only the election cycle-to-date totals (11/9/16 through 11/6/18). (52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)) and 11 CFR § 104.3)

2. Schedule A of your report discloses one or more contributions that appear to be from a corporation(s) and/or labor organization(s) (see attached). 52 U.S.C. § 30118(a) (formerly 2 U.S.C. § 441b(a)) and 11 CFR § 103.3(b) prohibit the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

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

If you have received prohibited contributions, you must make a refund within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(1) and (2))

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If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund is made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

3. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,700 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))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if, within 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below.

For reattributions, excessive contributions from individuals can be retained if, within 60 days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. 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

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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 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 is properly redesignated 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) your 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)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, 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 of the contribution, the excessive amount must be refunded. See 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 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,

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redesignate, and/or reattribute the excessive amount will be taken into consideration.

4. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An authorized or principal campaign committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 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 §§ 102.12(c) and 102.13(c))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

The funds can be retained if, within 60 days of receipt, the excessive amount was properly designated for a different election by obtaining signed written authorization from the contributor(s) pursuant to 11 CFR §§ 110.1(b)(5) and 110.2(b)(5). Any request from a donor for a refund must be honored.

If the foregoing conditions for redesignations were not met within 60 days of receipt, the excessive amount must be refunded. See 11 CFR § 103.3(b)(3).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks and/or letters 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 in which they are made. Redesignations are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation 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 the excessive amount will be taken into consideration.

5. Schedule A of your report discloses one or more contributions received after the 2018 general election that are designated for the 2018 general. These contributions may only be accepted to the extent that the committee has net

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debts outstanding from the 2018 general election.

For more information on how to calculate net debts outstanding, please see page 27 of the Campaign Guide for Congressional Candidates and Committees, which is available online at <http://transition.fec.gov/pdf/candgui.pdf>. (11 CFR § 110.1(b)(3)(i))

A contribution is considered made when the contributor relinquishes control over the contribution. A contributor shall be considered to have relinquished control over the contribution when it is delivered to the candidate, when it is delivered to an authorized committee of the candidate, or to an agent of an authorized committee of the candidate. A contribution that is mailed to any of the aforementioned recipients will be considered made on the date of the postmark. Envelopes should be retained for the committee's records. (11 CFR § 110.1(b)(6))

If any contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If a contribution was made by the contributor before or on the date of the applicable election, please amend your report to indicate this using memo text, or provide this information in a Miscellaneous Document (Form 99 for electronic filers).

If a contribution exceeds the amount of net debts outstanding from the 2018 general election, you may have to refund or redesignate the contribution.

The funds can be retained if, within 60 days of receipt, the excessive amount was properly redesignated 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))

If the foregoing conditions for redesignations are not met within 60 days of receipt, the excessive amount must be refunded. See 11 CFR § 103.3(b)(3).

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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 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 in which they are made. Redesignations are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation 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 the excessive amount will be taken into consideration.

6. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions (to include loans, in-kind contributions, and advances) received by your committee after the close of books for the 12 Day Pre-General Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

7. Your report discloses a negative ending cash balance of \$119,614.35. This suggests that you have overdrawn your account, made a mathematical error, or incurred a debt. If your committee has incurred a debt or obligation, please itemize this debt on Schedule D, show a zero balance on Line 8 of the Summary Page and include the amount on Line 10. If the negative ending cash balance is a result of an overdraft, it may constitute a prohibited bank contribution unless it is made on an account that has automatic overdraft protection with usual and customary interest rates and a definite repayment schedule. Please file an amendment to your report to accurately disclose your financial activities. (52 U.S.C. § 30104(b)(8) (formerly 2 U.S.C. § 434(b)(8)) and 11 CFR § 104.3(d))

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8. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in an election cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The attached employer and occupation entries appear on your report and are not considered acceptable.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(i)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed

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description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

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 <http://transition.fec.gov/rad/>. 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) 694-1132.

Sincerely,



Chris Jones
Campaign Finance Analyst
Reports Analysis Division

Apparent Excessive, Prohibited, and Impermissible Contributions
Steve Chabot for Congress (C00301838)

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Joseph, Ronald	11/10/2016	\$1,500.00	P2020
Joseph, Ronald	11/19/2018	\$2,000.00	P2020

Apparent Excessive Contributions from Committees

Contributor Name	Date	Amount	Election
Asian American Hotel Owner Association PAC	6/29/2018	\$2,500.00	G2018
Asian American Hotel Owner Association PAC	11/2/2018	\$2,500.00	G2018
Asian American Hotel Owners Association PAC	11/1/2018	\$2,500.00	G2018

Contributions from Possible Prohibited Entities

Contributor Name	Date	Amount	Election
CSK Electric	10/19/2018	\$250.00	G2018

Apparent Excessive Contributions from Authorized Committees of Other Federal Candidates

Contributor Name	Date	Amount	Election
Robert Aderholt for Congress	11/5/2018	\$2,000.00	G2018
Robert Aderholt for Congress	10/29/2018	\$2,500.00	G2018

Missing 48-Hour Notices
Steve Chabot for Congress (C00301838)

Contributor Name	Date	Amount	Election
Aircraft Owners and Pilots Association	10/23/2018	\$1,000.00	G2018
Auto Care Assn. PAC	10/23/2018	\$1,000.00	G2018
Buchwald, Maureen F.	10/23/2018	\$1,000.00	G2018
CNG Holdings Inc, PAC	10/23/2018	\$1,700.00	G2018
CtaPAC	10/23/2018	\$1,000.00	G2018
Devilbiss, Edwin	10/23/2018	\$1,000.00	G2018
Fischer, John	10/23/2018	\$1,000.00	G2018
General Electric Company	10/23/2018	\$1,000.00	G2018
Kaylas List PAC	10/23/2018	\$3,000.00	G2018
Lippert, Christine C.	10/23/2018	\$2,550.00	G2018
Lippert, Jr., Wayne A.	10/23/2018	\$2,450.00	G2018
Maintaining All Republicans In Office PAC	10/23/2018	\$1,000.00	G2018
Oral and Maxillofacial Surgery (OMS PAC)	10/23/2018	\$3,000.00	G2018
Patriot Round Iv 2018	10/23/2018	\$4,685.58	G2018
Reingold, Robert B.	10/23/2018	\$2,700.00	G2018
Toms, Jennifer J.	10/23/2018	\$2,700.00	G2018
KOCHPAC	10/24/2018	\$5,000.00	G2018
Brown, Timothy	10/25/2018	\$1,000.00	G2018
Mayfield, Glen	10/25/2018	\$1,000.00	G2018
National Apartment Association (NAA) PAC	10/25/2018	\$2,500.00	G2018
Niada-PAC	10/25/2018	\$1,495.00	G2018
Zicka, Pat	10/25/2018	\$2,000.00	G2018
Build PAC	10/26/2018	\$2,500.00	G2018
Cintas Corp PAC	10/26/2018	\$2,000.00	G2018
Citizens For John Rutherford	10/26/2018	\$1,000.00	G2018
Eichhold, Diane	10/26/2018	\$2,000.00	G2018
Fisher, Robert	10/26/2018	\$1,500.00	G2018
Hurt, Jeffrey C.	10/26/2018	\$2,700.00	G2018
Jr., Jay W.	10/26/2018	\$2,500.00	G2018
Krul II, William H.	10/26/2018	\$1,000.00	G2018
Miller Coors LLC PAC	10/26/2018	\$1,000.00	G2018
Miller, Betty L.	10/26/2018	\$2,700.00	G2018
Morrell, Gary L.	10/26/2018	\$1,200.00	G2018
Murray Energy PAC	10/26/2018	\$5,000.00	G2018
Ohio Coal PAC	10/26/2018	\$1,000.00	G2018
Reschini, Anna-marie Nelson	10/26/2018	\$2,700.00	G2018
Reschini, Joseph	10/26/2018	\$2,700.00	G2018
Rice, Kaylee D.	10/26/2018	\$2,700.00	G2018
The Good Fund	10/26/2018	\$1,000.00	G2018

Missing 48-Hour Notices
Steve Chabot for Congress (C00301838)

Contributor Name	Date	Amount	Election
Ware, Kenny	10/26/2018	\$1,000.00	G2018
Wave PAC	10/26/2018	\$1,000.00	G2018
White, Donald W.	10/26/2018	\$1,700.00	G2018
Cleveland, Jay W.	10/27/2018	\$2,500.00	G2018
Owner Operator Ind. Drivers Assn. PAC	10/27/2018	\$1,000.00	G2018
Altria Group, Inc. PAC	10/29/2018	\$2,500.00	G2018
Burger King PAC	10/29/2018	\$2,000.00	G2018
Cherokee Nation	10/29/2018	\$1,000.00	G2018
Duke Energy Corporation PAC - Federal	10/29/2018	\$1,000.00	G2018
In The Arena PAC	10/29/2018	\$3,000.00	G2018
IWLA Pac	10/29/2018	\$2,500.00	G2018
Mike Johnson For Louisiana	10/29/2018	\$1,000.00	G2018
Nesbitt, Patrick	10/29/2018	\$1,400.00	G2018
Pies, Gary	10/29/2018	\$1,000.00	G2018
Robert Aderholt for Congress	10/29/2018	\$2,500.00	G2018
Marathon Oil Company Employees	10/30/2018	\$2,500.00	G2018
American Principles PAC	10/31/2018	\$1,000.00	G2018
Calandra, Jr., Frank	10/31/2018	\$2,700.00	G2018
Calandra, Karl	10/31/2018	\$2,700.00	G2018
Calandra, Rosemarie	10/31/2018	\$2,700.00	G2018
Cognizant Technology Solutions PAC	10/31/2018	\$2,000.00	G2018
In Rural Kentucky PAC	10/31/2018	\$1,000.00	G2018
Florida Congressional Committee	10/31/2018	\$1,500.00	G2018
H.u.r.d. PAC	10/31/2018	\$3,000.00	G2018
Heart Doc PAC	10/31/2018	\$2,000.00	G2018
Looney, Henry	10/31/2018	\$2,000.00	G2018
Maziarz, Laurie	10/31/2018	\$2,700.00	G2018
Maziarz, Timothy	10/31/2018	\$2,700.00	G2018
Neuberger, Jennifer	10/31/2018	\$2,700.00	G2018
Neuberger, William II	10/31/2018	\$2,700.00	G2018
Orourke, Michael P.	10/31/2018	\$1,000.00	G2018
Szablewski, Chris	10/31/2018	\$2,250.00	G2018
Taylor, Kenneth	10/31/2018	\$2,700.00	G2018
Vernon, Bryan	10/31/2018	\$1,000.00	G2018
BrettPAC	11/2/2018	\$1,000.00	G2018
Fifth Third Bancorp PAC	11/2/2018	\$2,700.00	G2018
Guthrie for Congress	11/2/2018	\$1,000.00	G2018
Reaching For A Brighter America PAC	11/2/2018	\$1,000.00	G2018

Inadequate Employer/Occupation Entries
Steve Chabot for Congress (C00301838)

Employer	Occupation
Cleveland Brothers	Information Requested
Denier Electric	Information Requested
Hanner Machine LLC	Information Requested
ICR Contracting	Information Requested
IEC Cincinnati	Information Requested
Information Requested	Attorney
Information Requested	Information Requested
Kemba Credit Union	Null
Miller Contracting Services, Inc.	Information Requested
Null	Null
Reschini Agency	Information Requested