

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 26, 2019

DAN BACKER, TREASURER GREAT AMERICA PAC 107 S WEST ST SUITE 555 ALEXANDRIA, VA 22314

Response Due Date 07/31/2019

IDENTIFICATION NUMBER: C00608489

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 <u>3</u> item(s):

1. Schedule A supporting Line 11(a)(i) (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 52 U.S.C. §30116(f) (formerly 2 U.S.C. §441a(f)) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year. However, Commission records indicate that your Committee maintains a Non-Contribution Account consistent with the stipulated judgment in Carey v. FEC.

If the apparently excessive contribution(s) in question was deposited into your Non-Contribution Account, please amend your report to disclose the item on Schedule A supporting Line 17 of the Detailed Summary Page and disclose "Non-Contribution Account" in the description field or in memo text. For more information please reference the "Reporting Guidance for Political Committees that Maintain and Non-Contribution Account" at <a href="http://classic.fec.gov/pages/fecrecord/november2011/fecstatementcareyvfec.sht">http://classic.fec.gov/pages/fecrecord/november2011/fecstatementcareyvfec.sht</a>

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, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer

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informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

2. Schedule E of your report indicates that your committee may have failed to file one or more of the required 24 hour reports regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))

3. Your committee has filed 48 hour reports for an independent expenditures

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supporting "TRUMP, DONALD J" (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48 hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

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) 694-1140.

Sincerely,

aligail Capps

Abigail Capps Campaign Finance Analyst Reports Analysis Division

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## Excessive Contributions GREAT AMERICA PAC (C00608489)

### **Excessive Contributions from Individuals**

<b>Contributor Name</b>	Date	Amount	Report	
BAKER, KATHRYN E. MRS.	10/30/18	\$10,000.00	2018 30 Day Post-General	
FARRAH, PATRICK	8/5/18	\$1,000.00	2018 September Monthly	
FARRAH, PATRICK	8/22/19	\$5.00	2018 September Monthly	
FARRAH, PATRICK	8/25/18	\$100.00	2018 September Monthly	
FARRAH, PATRICK	8/28/18	\$1,000.00	2018 September Monthly	
FARRAH, PATRICK	8/29/18	\$95.00	2018 September Monthly	
FARRAH, PATRICK	8/30/18	\$1,000.00	2018 September Monthly	
FARRAH, PATRICK	9/4/18	\$100.00	2018 October Monthly	
FARRAH, PATRICK	9/6/18	\$100.00	2018 October Monthly	
FARRAH, PATRICK	9/6/18	\$100.00	2018 October Monthly	
FARRAH, PATRICK	9/13/18	\$1,000.00	2018 October Monthly	
FARRAH, PATRICK	9/17/18	\$1,000.00	2018 October Monthly	
FARRAH, PATRICK	10/31/18	\$500.00	2018 30 Day Post-General	
KASSLING, WILLIAM	1/15/18	\$500.00	2018 February Monthly	
KASSLING, WILLIAM	2/15/18	\$500.00	2018 March Monthly	
KASSLING, WILLIAM	3/15/18	\$500.00	2018 April Monthly	
KASSLING, WILLIAM	4/15/18	\$500.00	2018 May Monthly	
KASSLING, WILLIAM	5/15/18	\$500.00	2018 June Monthly	
KASSLING, WILLIAM	6/15/18	\$500.00	2018 July Monthly	
KASSLING, WILLIAM	7/15/18	\$500.00	2018 August Monthly	
KASSLING, WILLIAM	8/15/18	\$500.00	2018 September Monthly	
KASSLING, WILLIAM	9/15/18	\$500.00	2018 October Monthly	
KASSLING, WILLIAM	10/15/18	\$500.00	2018 12 Day Pre-General	
KASSLING, WILLIAM	11/15/18	\$500.00	2018 30 Day Post-General	
PIERCE, DAVID	4/11/18	\$245.00	2018 May Monthly	
PIERCE, DAVID	7/19/18	\$250.00	2018 August Monthly	
PIERCE, DAVID	9/6/18	\$250.00	2018 October Monthly	
PIERCE, DAVID	9/13/18	\$100.00	2018 October Monthly	
PIERCE, DAVID	9/20/18	\$245.00	2018 October Monthly	
PIERCE, DAVID	9/26/18	\$500.00	2018 October Monthly	
PIERCE, DAVID	10/9/18	\$2,000.00	2018 12 Day Pre-General	
PIERCE, DAVID	11/2/18	\$1,000.00	2018 30 Day Post-General	

# Excessive Contributions GREAT AMERICA PAC (C00608489)

PIERCE, DAVID	11/8/18	\$100.00	2018 30 Day Post-General
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RUTTER, DAWSON	5/1/18	\$1,000.00	2018 June Monthly
RUTTER, DAWSON	6/30/18	\$1,000.00	2018 July Monthly
RUTTER, DAWSON	7/30/18	\$1,000.00	2018 August Monthly
RUTTER, DAWSON	8/30/18	\$1,000.00	2018 September Monthly
RUTTER, DAWSON	9/30/18	\$1,000.00	2018 October Monthly
RUTTER, DAWSON	10/30/18	\$1,000.00	2018 30 Day Post-General
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STEINKAMP, JEFFREY	1/16/18	\$2,000.00	2018 February Monthly
STEINKAMP, JEFFREY	3/14/18	\$1,000.00	2018 April Monthly
STEINKAMP, JEFFREY	4/2/18	\$500.00	2018 May Monthly
STEINKAMP, JEFFREY	5/1/18	\$2,000.00	2018 June Monthly
STEINKAMP, JEFFREY	6/29/18	\$1,000.00	2018 July Monthly
STEINKAMP, JEFFREY	7/20/18	\$1,000.00	2018 August Monthly
STEINKAMP, JEFFREY	8/30/18	\$1,000.00	2018 September Monthly
STEINKAMP, JEFFREY	10/23/18	\$25.00	2018 30 Day Post-General
STEINKAMP, JEFFREY	10/30/18	\$1,000.00	2018 30 Day Post-General
STEINKAMP, JEFFREY	11/21/18	\$100.00	2018 30 Day Post-General
WALCOTT JR., ROGER B	9/22/18	\$5,000.00	2018 October Monthly
WALCOTT JR., ROGER B	10/21/18	\$5,000.00	2018 30 Day Post-General

# Missing 24 Hour Report (Schedule E) GREAT AMERICA PAC (C00608489)

Name of Payee	Dissemination Date	Amount	Candidate	Election
APEX STRATEGY GROUP. INC	10/29/18	\$3,930.00	HEITKAMP, HEIDI	G2018
APEX STRATEGY GROUP. INC	10/29/18	\$3,930.00	TESTER, JOHN	G2018

## Missing Schedule E (48 Hour Report) GREAT AMERICA PAC (C00608489)

Name of Payee	Dissemination Date	Amount	Candidate	Election
CAMPAIGN SOLUTIONS	11/9/18	\$1,000.00	TRUMP, DONALD J	G2020
CAMPAIGN SOLUTIONS	11/9/18	\$2,000.00	TRUMP, DONALD J	G2020
CAMPAIGN SOLUTIONS	11/9/18	\$2,000.00	TRUMP, DONALD J	G2020
CAMPAIGN SOLUTIONS	11/9/18	\$8,000.00	TRUMP, DONALD J	G2020
CAMPAIGN SOLUTIONS	11/9/18	\$12,000.00	TRUMP, DONALD J	G2020
CAMPAIGN SOLUTIONS	11/9/18	\$30,000.00	TRUMP, DONALD J	G2020
CONNELL DONATELLI INC.	11/9/18	\$1,000.00	TRUMP, DONALD J	G2020
CONNELL DONATELLI INC.	11/9/18	\$8,000.00	TRUMP, DONALD J	
INFOCISION MANAGEMENT CORPORATION	11/9/18	\$1,000.00	TRUMP, DONALD J	G2020
INFOCISION MANAGEMENT				
CORPORATION	11/9/18	\$22,000.00	TRUMP, DONALD J	G2020
MESSAGE MADE EASY LLC	11/9/18	\$250.00	TRUMP, DONALD J	G2020
MESSAGE MADE EASY LLC	11/9/18	\$500.00	TRUMP, DONALD J	
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POLITICAL LIST BROKERS LLC	11/9/18	\$1,000.00	TRUMP, DONALD J	G2020
POLITICAL LIST BROKERS LLC	11/9/18	\$3,500.00	TRUMP, DONALD J	G2020
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RIGHT COUNTRY LISTS	11/9/18	\$250.00	TRUMP, DONALD J	
RIGHT COUNTRY LISTS	11/9/18	\$500.00	TRUMP, DONALD J	G2020
RRTVMEDIA LLC	11/9/18	\$1,000.00	TRUMP, DONALD J	G2020
RRTVMEDIA LLC	11/9/18	\$48,000.00	TRUMP, DONALD J	