



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

January 7, 2025

GAIL PHILLIPS, TREASURER
NATIONAL ASSOCIATION OF RESIDENTIAL
PROPERTY MANAGERS, INC. POLITICAL
ACTION COMMITTEE (NARPM PAC)
1403 GREENBRIER PARKWAY SUITE 100
CHESAPEAKE, VA 23320

Response Due Date
02/11/2025

IDENTIFICATION NUMBER: C00567792

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2024 - 09/30/2024)

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 2 item(s):

1. Schedule A of your report discloses receipts of \$195.72 from the "National Association of Residential Property Managers, Inc. Political Action Committee (NARPM PAC)." Please clarify whether these receipts are from an account maintained by your committee for non-federal activity. If so, be advised that such receipts are prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the receipts should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer out. In addition, the transfer out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration. (52 U.S.C. §30118(a) & 11 CFR §103.3(b)(1) and (2))

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2. Schedule B supporting Line 23 discloses one or more contributions to candidates for the 2024 Primary election; however, the funds were disbursed after the election dates (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contributions in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund or redesignation request) for each contribution. The committee should retain for its records copies of the refund and/or redesignation request(s) sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contributions will be taken into consideration.

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, federal operating expenditures should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) and FORM 3X Instructions)

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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 information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you 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) 694-1175.

Sincerely,

A handwritten signature in dark ink that reads "Sarah Vivian". The script is cursive and fluid, with the first letters of each name being capitalized and prominent.

Sarah Vivian

Sr. Campaign Finance & Reviewing Analyst

Apparent Impermissible, Excessive, and Prohibited Contributions**National Association of Residential Property Mangers, Inc. Political Action Committee (NARPM PAC) (C00567792)****Apparent Contributions Made After Election Date**

Recipient Name	Date	Amount	Election	Election (State-Date)
CHUCK EDWARDS FOR CONGRESS	7/10/24	\$1,000.00	P2024	NC - 3/5/24
Citizens for John Rutherford	9/19/24	\$1,000.00	P2024	FL - 8/20/24
Citizens for Waters	9/19/24	\$1,000.00	P2024	CA - 3/5/24
DELBENE FOR CONGRESS	9/19/24	\$1,000.00	P2024	WA - 8/6/24
FRIENDS OF SHERROD BROWN	9/19/24	\$1,000.00	P2024	OH - 3/19/24
JEFFRIES FOR CONGRESS	9/19/24	\$1,000.00	P2024	NY - 6/25/24
LAWLER FOR CONGRESS, INC.	9/19/24	\$1,000.00	P2024	NY - 6/25/24
Lance Gooden for Congress Committee	9/19/24	\$1,000.00	P2024	TX - 3/5/24
LORI CHAVEZ-DEREMER FOR CONGRESS	9/19/24	\$1,000.00	P2024	OR - 5/21/24