



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 28, 2020

REBECCA BOND, TREASURER
REAL JUSTICE PAC
3041 MISSION ST. #327
SAN FRANCISCO, CA 94110

Response Due Date
07/02/2020

IDENTIFICATION NUMBER: C00632554

REFERENCE: YEAR-END REPORT (07/01/2019 - 12/31/2019)

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 supporting Line 17 (see attached) discloses a receipt(s) from an organization(s) that is not registered with the Commission. 52 U.S.C. §30118 (formerly 2 U.S.C. §441b) prohibits the receipt of funds from national banks, corporations, and labor organizations. However, Commission records indicate that your Committee maintains a Non-Contribution Account consistent with the stipulated judgment in Carey v. FEC.

If the amounts in question were deposited into your Committee's 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 a Non-Contribution Account" at <https://www.fec.gov/updates/fec-statement-on-carey-v-fec/>

If you have received a prohibited contribution, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited 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, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

Please inform the Commission of your corrective action promptly by providing

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the date and method of your remedy (refund or transfer to a non-federal account) for each contribution. The committee should retain for its records copies of refund checks and transfers to nonfederal account for the contributions in question. In addition, 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 concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

2. Schedule A (see attached) discloses a contribution(s) from an individual(s) who has a mailing address outside of the United States of America. Please be advised that 52 U.S.C. §30121(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR §110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action promptly by providing the date of the refund. The committee should retain for its records copies of refund check(s). In addition, any refunds should be disclosed on Schedule B supporting Line 28 (a) of the report during which the transaction was made.

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Although the Commission may take further legal action concerning the acceptance of a prohibited contribution(s), prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

- -Schedule A supporting Line 15 of your report discloses one or more contributions totaling \$4,656.06 from "Chesa Boudin for District Attorney 2019", which appears to be a an organization that is not a political committee. However, you have also disclosed "Non-Contribution Account" for this contribution(s). For your information and consideration when preparing future filings, contributions deposited into your Committee's Non-Contribution Account should be properly disclosed on a separate Schedule A, supporting Line 17 of the Detailed Summary Page, with "Non-Contribution Account" disclosed in the description field or in memo text. Please refer to the "Reporting Guidance for Political Committees that Maintain a Non-Contribution Account" at <https://www.fec.gov/updates/fec-statement-on-carey-v-fec> when determining the proper categorization(s) for your next filing.

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 (RAFI), 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) 694-1157.

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Sincerely,

A handwritten signature in black ink, appearing to read 'A. Chamorro', with a stylized flourish at the end.

Andrea Chamorro
Senior Campaign Finance Analyst
Reports Analysis Division

**Apparent Impermissible, Excessive, and Prohibited Contributions
Real Justice PAC (C00632554)**

Contributions from Possible Prohibited Entities (Corporations, Labor Organization, LLCs)

Contributor Name	Date	Amount	Report
Sixteen Thirty Fund	7/31/19	\$100,000.00	2019 Year-End

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
Morris, Rashida	7/22/19	\$27.00	2019 Year-End
Morris, Rashida	8/22/19	\$27.00	2019 Year-End
Morris, Rashida	9/22/19	\$27.00	2019 Year-End
Morris, Rashida	10/22/19	\$27.00	2019 Year-End
Morris, Rashida	11/22/19	\$27.00	2019 Year-End
Morris, Rashida	12/22/19	\$27.00	2019 Year-End