



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

February 12, 2025

NICHOLAS GUTHMAN, TREASURER
YOUTH PROGRESSIVE ACTION CATALYST
1250 I STREET NW SUITE 330
WASHINGTON, DC 20005

Response Due Date
03/19/2025

IDENTIFICATION NUMBER: C00670216

REFERENCE: 30 DAY POST-GENERAL REPORT (10/17/2024 - 11/25/2024)

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 4 item(s):

1. Line 23 of the Detailed Summary Page of your report discloses a total of \$26,400 in contributions to federal candidates and committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$15,650. Please amend your report to clarify the discrepancy. (52 U.S.C. §30104(b) and 11 CFR §104.3)
2. Schedule A supporting Line 11(a)(i) of the Detailed Summary Page (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 52 U.S.C. §30116(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 <https://www.fec.gov/updates/fec-statement-on-carey-v-fec/>

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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 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 by providing the date and method of your remedy (refund, transfer to a non-federal account and/or reattribution) for each contribution. The committee should retain for its records copies of refund checks, transfers to nonfederal account, and/or letters reattributing the contributions in question. 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.

3. 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

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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.

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.

4. Schedule B supporting Line 23 discloses one or more contributions to a candidate(s) for the 2024 General election; however, the funds were disbursed after the election date(s) (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 contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

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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 contribution(s) will be taken into consideration.

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 (RFAI), 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) 694-1323.

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Sincerely,

A handwritten signature in blue ink, appearing to read 'AK', with a long horizontal line extending to the right.

Aaron Kelley
Campaign Finance Analyst

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**Apparent Impermissible, Excessive, and Prohibited Contributions
Youth Progressive Action Catalyst (C00670216)**

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Report
Fluhrer, Patricia	1/29/24	\$500.00	2024 April Quarterly
Fluhrer, Patricia	2/27/24	\$500.00	2024 April Quarterly
Fluhrer, Patricia	3/31/24	\$500.00	2024 April Quarterly
Fluhrer, Patricia	4/29/24	\$500.00	2024 July Quarterly
Fluhrer, Patricia	5/28/24	\$500.00	2024 July Quarterly
Fluhrer, Patricia	6/28/24	\$500.00	2024 July Quarterly
Fluhrer, Patricia	8/20/24	\$500.00	2024 October Quarterly
Fluhrer, Patricia	9/28/24	\$500.00	2024 October Quarterly
Fluhrer, Patricia	10/20/24	\$250.00	2024 30-Day Post-General
Fluhrer, Patricia	10/24/24	\$500.00	2024 30-Day Post-General
Fluhrer, Patricia	11/3/24	\$500.00	2024 30-Day Post-General
Smudz, Susan	2/14/24	\$100.00	2024 April Quarterly
Smudz, Susan	3/7/24	\$300.00	2024 April Quarterly
Smudz, Susan	3/13/24	\$200.00	2024 April Quarterly
Smudz, Susan	3/19/24	\$200.00	2024 April Quarterly
Smudz, Susan	3/20/24	\$375.00	2024 April Quarterly
Smudz, Susan	3/23/24	\$300.00	2024 April Quarterly
Smudz, Susan	4/13/24	\$250.00	2024 July Quarterly
Smudz, Susan	4/20/24	\$200.00	2024 July Quarterly
Smudz, Susan	4/27/24	\$200.00	2024 July Quarterly
Smudz, Susan	5/4/24	\$250.00	2024 July Quarterly
Smudz, Susan	5/9/24	\$150.00	2024 July Quarterly
Smudz, Susan	5/15/24	\$500.00	2024 July Quarterly
Smudz, Susan	5/28/24	\$250.00	2024 July Quarterly
Smudz, Susan	6/10/24	\$100.00	2024 July Quarterly
Smudz, Susan	7/7/24	\$200.00	2024 October Quarterly
Smudz, Susan	7/9/24	\$250.00	2024 October Quarterly

**Apparent Impermissible, Excessive, and Prohibited Contributions
Youth Progressive Action Catalyst (C00670216)**

Smudz, Susan	7/25/24	\$200.00	2024 October Quarterly
Smudz, Susan	8/3/24	\$170.00	2024 October Quarterly
Smudz, Susan	8/10/24	\$300.00	2024 October Quarterly
Smudz, Susan	8/22/24	\$200.00	2024 October Quarterly
Smudz, Susan	8/27/24	\$100.00	2024 October Quarterly
Smudz, Susan	8/30/24	\$200.00	2024 October Quarterly
Smudz, Susan	9/21/24	\$500.00	2024 October Quarterly
Smudz, Susan	10/19/24	\$170.00	2024 30-Day Post-General
Smudz, Susan	10/25/24	\$170.00	2024 30-Day Post-General
Smudz, Susan	11/2/24	\$180.00	2024 30-Day Post-General
Smudz, Susan	11/4/24	\$100.00	2024 30-Day Post-General
Smudz, Susan	11/5/24	\$100.00	2024 30-Day Post-General
Smudz, Susan	11/12/24	\$85.00	2024 30-Day Post-General
Smudz, Susan	11/16/24	\$300.00	2024 30-Day Post-General
Smudz, Susan	11/17/24	\$100.00	2024 30-Day Post-General
Smudz, Susan	11/18/24	\$100.00	2024 30-Day Post-General

**Apparent Impermissible, Excessive, and Prohibited Contributions
Youth Progressive Action Catalyst (C00670216)**

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
Solez, Elaine	10/22/24	\$25.00	2024 30-Day Post-General
Solez, Elaine	11/22/24	\$25.00	2024 30-Day Post-General
Voorhees, Scott	11/3/24	\$250.00	2024 30-Day Post-General
Voorhees, Scott	11/4/24	\$250.00	2024 30-Day Post-General

**Apparent Impermissible, Excessive, and Prohibited Contributions
Youth Progressive Action Catalyst (C00670216)**

Apparent Contributions Made After Election Date

Recipient Name	Date	Amount	Election	Election
TRAN, DEREK	11/13/24	\$100.00	G2024	11/5/24
TRAN, DEREK	11/13/24	\$100.00	G2024	11/5/24
TRAN, DEREK	11/13/24	\$200.00	G2024	11/5/24
TRAN, DEREK	11/14/24	\$200.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$200.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$180.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$50.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$60.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$70.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$200.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$120.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$200.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$200.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$40.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$140.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$200.00	G2024	11/5/24
WHITESIDES, GEORGE	11/13/24	\$60.00	G2024	11/5/24
CASEY, ROBERT P. JR.	11/13/24	\$60.00	G2024	11/5/24
GALLEG0, RUBEN	11/13/24	\$40.00	G2024	11/5/24
GALLEG0, RUBEN	11/13/24	\$40.00	G2024	11/5/24
GALLEG0, RUBEN	11/13/24	\$60.00	G2024	11/5/24
GALLEG0, RUBEN	11/13/24	\$20.00	G2024	11/5/24
GALLEG0, RUBEN	11/13/24	\$40.00	G2024	11/5/24
GALLEG0, RUBEN	11/13/24	\$40.00	G2024	11/5/24
GALLEG0, RUBEN	11/13/24	\$40.00	G2024	11/5/24

**Apparent Impermissible, Excessive, and Prohibited Contributions
Youth Progressive Action Catalyst (C00670216)**

GALLEGO, RUBEN	11/13/24	\$60.00	G2024	11/5/24
GALLEGO, RUBEN	11/13/24	\$40.00	G2024	11/5/24
GALLEGO, RUBEN	11/13/24	\$40.00	G2024	11/5/24
GALLEGO, RUBEN	11/13/24	\$40.00	G2024	11/5/24
GALLEGO, RUBEN	11/13/24	\$40.00	G2024	11/5/24
GALLEGO, RUBEN	11/14/24	\$60.00	G2024	11/5/24
GALLEGO, RUBEN	11/15/24	\$100.00	G2024	11/5/24
ROLLINS, WILL	11/13/24	\$70.00	G2024	11/5/24
ROLLINS, WILL	11/13/24	\$40.00	G2024	11/5/24
ROLLINS, WILL	11/14/24	\$100.00	G2024	11/5/24
GRAY, ADAM C.	11/15/24	\$100.00	G2024	11/5/24
GRAY, ADAM C.	11/15/24	\$120.00	G2024	11/5/24
GRAY, ADAM C.	11/15/24	\$200.00	G2024	11/5/24
GRAY, ADAM C.	11/15/24	\$180.00	G2024	11/5/24
GRAY, ADAM C.	11/18/24	\$200.00	G2024	11/5/24
GRAY, ADAM C.	11/18/24	\$80.00	G2024	11/5/24
GRAY, ADAM C.	11/19/24	\$120.00	G2024	11/5/24