



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 2, 2023

JUSTIN PHILLIPS, TREASURER
AMERICAN ISRAEL PUBLIC AFFAIRS COMMITTEE POLITICAL ACTION COMMITTEE
251 H ST NW
WASHINGTON, DC 20001

Response Due Date

11/06/2023

IDENTIFICATION NUMBER: C00797670

REFERENCE: JULY MONTHLY REPORT (06/01/2023 - 06/30/2023)

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 3 item(s):

1. Your report discloses the apparent disbursement of earmarked contributions outside the permissible time period. As a conduit or intermediary for an authorized committee, your committee must forward any earmarked contribution, along with a transmittal report, no later than ten (10) days after receiving the earmarked contribution. (11 CFR §§102.8(a) and (c) and 110.6(c) (1)(iii))

If the earmarked contributions were incompletely or incorrectly disclosed, you should amend your report with clarifying information.

Although the Commission may take further legal action regarding the untimely forwarding of earmarked contributions, your prompt action in addressing the concerns raised will be taken into consideration.

2. Schedule B of your report discloses earmarked contributions totaling \$3,300, with no corresponding entries on Schedule A. Pursuant to 11 CFR §110.6(c), all earmarked contributions, that have passed through a conduit's account, must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please identify the original contributors for the earmarked contributions disclosed on Schedule B.

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3. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(a) prohibits a committee and its affiliates from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

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

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

Please inform the Commission of your corrective action promptly by providing the date of the refund request for each contribution. The committee should retain for its records copies of the request(s) sent to the recipient committee(s) and refund checks. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

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

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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) 694-1622.

Sincerely,

A handwritten signature in black ink that reads "Aaron Carrell". The signature is written in a cursive, slightly slanted style.

Aaron Carrell
Campaign Finance Analyst

Apparent Impermissible, Excessive, and Prohibited Contributions
American Israel Public Affairs Committee Political Action Committee (C00797670)

Apparent Excessive Contributions to a Committee/Candidate Committee

Recipient Name	Date	Amount	Election	Report
MENENDEZ FOR SENATE	3/6/23	\$5,000.00	P2024	2023 April Monthly
MENENDEZ FOR SENATE	6/5/23	\$1,000.00	P2024	2023 July Monthly