



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

January 7, 2024

MR. BILL HIMPLER, TREASURER
AMERICAN FINANCIAL SERVICES ASSOCIATION PAC
919 18TH STREET, NW SUITE 300
WASHINGTON, DC 20006

Response Due Date
02/12/2024

IDENTIFICATION NUMBER: C00038604

REFERENCE: AMENDED NOVEMBER MONTHLY REPORT (10/01/2023 - 10/31/2023),
RECEIVED 12/19/2023

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 1 item(s):

- The Commission notes the redesignation and/or reattribution of a contribution. Please amend your report to disclose the proper format for redesignations and/or reattributions. The first entry must disclose, as a memo entry, the information for the contribution as it was originally reported; the second entry must disclose, as a memo entry, the information as it has been redesignated or reattributed, including the date the redesignation or reattribution documentation was made/received by the committee (11 CFR §104.8(d)(2), (3), and (4)) The Committee should also provide the Commission with a copy of the signed documentation. See the attached sample of properly reported reattributions.

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

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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) 694-1622.

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

SAMPLE**Completing FEC Form 3X**

(i.e., as a contribution from each person).

A joint contribution is itemized in items A and B in the illustration at left. In this case, the committee received a \$1,000 check from a married couple, signed by both spouses. Because there were no instructions as to how to attribute the check, the committee must divide it equally between the two spouses—\$500 from each. 110.1(k)(2).

By contrast, if the committee received instructions to attribute \$100 to the husband and \$900 to the wife, the committee would itemize the wife's contribution. The husband's \$100 contribution would have to be itemized only if he had previously given more than \$100 in the same calendar year, since his total contributions would then aggregate over \$200 (see items C and D in the illustration).

Reattributions

This section describes how to report contributions for which the committee has requested reattributions from contributors. (See page 13)

Receipt of Original Contribution

When itemizing a contribution that must be reattributed to correct an excessive amount, include a statement on Schedule A noting that a reattribution has been requested. 103.3(b)(5).

REATTRIBUTIONS (ORIGINAL CONTRIBUTION RECEIVED)

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one) ☒ 11a ☐ 11b ☐ 11c ☐ 12 ☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17	PAGE 1 OF 1
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				
NAME OF COMMITTEE (In Full) Civil Republic PAC				
Full Name (Last, First, Middle Initial) A. Benson, Jack			Date of Receipt 06 / 14 / 2008	
Mailing Address 22 France Drive City State Zip Code ST 00000			Amount of Each Receipt this Period 6000.00	
FEC ID number of contributing federal political committee. C			Reattribution Requested	
Name of Employer Travelco, Inc.			Occupation Assistant Vice President	
Receipt For: ☐ Primary ☐ General ☐ Other (specify) g			Aggregate Year-to-Date 6000.00	

REATTRIBUTION RECEIVED

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one) ☒ 11a ☐ 11b ☐ 11c ☐ 12 ☐ 13 ☐ 14 ☐ 15 ☐ 16 ☐ 17	PAGE 1 OF 1
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				
NAME OF COMMITTEE (In Full) Civil Republic PAC				
Full Name (Last, First, Middle Initial) A. Benson, Jack			Date of Receipt 06 / 14 / 2008	
Mailing Address 22 France Drive City State Zip Code ST 00000			Amount of Each Receipt this Period 6000.00	
FEC ID number of contributing federal political committee. C			MEMO Originally reported 6/14/2008. \$1,000 reattributed below	
Name of Employer Travelco, Inc.			Occupation Assistant Vice President	
Receipt For: ☐ Primary ☐ General ☐ Other (specify) ▼			Aggregate Year-to-Date 6000.00	
Full Name (Last, First, Middle Initial) B. Benson, Jack				
Mailing Address 22 France Drive City State Zip Code ST 00000			Date of Receipt 07 / 11 / 2008	
FEC ID number of contributing federal political committee. C			Amount of Each Receipt this Period -1000.00	
Name of Employer Travelco, Inc.			Occupation Assitant Vice President	
Receipt For: ☐ Primary ☐ General ☐ Other (specify) ▼			Aggregate Year-to-Date 5000.00	
Full Name (Last, First, Middle Initial) C. Benson, Sarah				
Mailing Address 22 France Drive City State Zip Code ST 00000			Date of Receipt 07 / 11 / 2008	
FEC ID number of contributing federal political committee. C			Amount of Each Receipt this Period 1000.00	
Name of Employer Travelco, Inc.			Occupation Legal Counsel	
Receipt For: ☐ Primary ☐ General ☐ Other (specify) ▼			Aggregate Year-to-Date 1000.00	

Campaign Guide for Nonconnected Committees

RETURNED/BOUNCED CHECK

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE 1 OF 1	
		☒ 11a		☐ 11b		☐ 11c	
		☐ 13		☐ 14		☐ 15	
		☐ 16		☐ 17			
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.							
NAME OF COMMITTEE (in Full) Civil Republic PAC							
Full Name (Last, First, Middle Initial) A. Scofflaw, John							
Mailing Address 100 Crooked Lane							
City				State		Zip Code	
City				ST		00000	
FEC ID number of contributing federal political committee.				C			
Name of Employer Self-employed				Occupation Contractor			
Receipt For: ☐ Primary ☐ General ☐ Other (specify) ▼				Aggregate Year-to-Date ▼ 0.00			
Date of Receipt 06 / 07 / 2008				Amount of Each Receipt this Period -250.00			
Bounced check, originally reported in April Quarterly report							

Checks received and returned by the bank in the same reporting period do not need to be reported.

Negative Entry

A negative entry is shown as a dollar amount with a negative sign in front. The amount is always deducted from the total for that schedule (and the corresponding line number on the Detailed Summary Page). A negative entry is used, for example, when a contributor's check bounces or is returned to the contributor without having been

deposited in the committee's account.

Receipt of Reattribution

In the report covering the reporting period during which the reattribution is received, itemize as memo entries:

- Information on the contribution as it was previously disclosed; and
- Information on the contribution as it was reattributed, including the date the reattribution was received. 104.8(d)(3).

Refund of Excessive Portion

If the committee does not receive the reattribution, the committee must refund the excessive portion within 60 days of the treasurer's receipt of the contribution. Disclose the refund on the next report. 103.3(b)(3) and (5); 104.8(d)(4). See also "Refunds Made by the Committee," page 67.

Bounced Checks

If a committee reports the receipt of a check and later finds it cannot be negotiated because of insufficient funds in the donor's account, the committee deducts the amount from its next report as follows:

- If the receipt was not itemized in a previous report, deduct the amount of the check from the total for unitemized contributions (Line 11(a)(ii) on the Detailed Summary Page).
- If the receipt was itemized previously, itemize the return of the check as a negative entry on a Schedule A for the appropriate line number.

3. Reporting Receipts: The Detailed Summary Page

Listed below are the categories of receipts found on the Detailed Summary Page. For each category, enter a total for the current reporting period and for the year to date.

Line 11. Contributions

Report total monetary and in-kind contributions received, both itemized and unitemized.

Line 11(a): Contributions from Individuals and Other Groups

Itemize contributions from individuals on a Schedule A for Line 11(a)(i). Unitemized totals should be entered on Line 11(a)(ii). Enter the total for Lines 11(a)(i) and 11(a)(ii) on Line 11(a)(iii). Rules concerning when to itemize contributions from individuals are explained on page 56. Contributions from partnerships are also reported on Line 11(a)(i); see also Appendix C for more information about reporting partnership contributions.