



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

April 19, 2026

ALEXANDRA D. DUNN, TREASURER
CROPLIFE AMERICA POLITICAL ACTION COMMITTEE
4201 WILSON BOULEVARD, SUITE 700
ARLINGTON, VA 22203-4417

Response Due Date

05/26/2026

IDENTIFICATION NUMBER: C00248849

REFERENCE: AMENDED YEAR-END REPORT (07/01/2025 - 12/31/2025), RECEIVED
02/06/2026

Dear Treasurer:

This notice 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. Your amended report discloses an increase in disbursements totaling \$17,791.00 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)

The Commission notes the memo text attached to your report stating, "A additional check was issued to reimburse expenses" Although the Commission may take further legal action concerning this matter, your clarification and any additional clarification you may have will be taken into consideration. 11 CFR §104.3

2. Schedule A 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(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.

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

If any contribution you received exceeds the limits, you may have to refund the

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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. (INCLUDE THIS SENTENCE IF CORRECTIVE ACTION DESCRIPTIONS ARE DISCLOSED: The Commission notes your additional explanation regarding the Committee's corrective action taken for (some/all) of these contributions.) 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.

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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.

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 of your report discloses a total of \$17,791.00 in payments to your connected organization for "Reimbursement of Auction Item Expenses." Please be advised that 52 U.S.C. §30118 prohibits a corporation or labor organization from contributing funds for the purpose of influencing any federal election; however, a connected organization may pay for the solicitation and administrative costs of its separate segregated fund. Further, 11 CFR §114.2(f) prohibits corporations and labor organizations from facilitating the making of contributions to candidates or political committees, other than to the separate segregated funds of the corporations and labor organizations. Facilitation means using corporate or labor organization resources or facilities to engage in fundraising activities in connection with any federal election. The use of

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corporate or labor organization resources in connection with a fundraiser may be permissible for certain fundraising activities only if the corporation or labor organization receives advance payment for the fair market value of such services. (11 CFR §114.2(f)(2)(i)(A), (C) and (E))

Please amend your report to clarify whether the payment to your connected organization was intended to influence federal elections and provide the dates of the activity conducted by your connected organization. In addition, please clarify whether your committee made advance payment for these services to your connected organization. Although the Commission may take further legal action concerning this matter, your prompt action 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) 694-1622.

Sincerely,



Aaron Carrell
Senior Campaign Finance Analyst

Apparent Impermissible, Excessive, and Prohibited Contributions
CROPLIFE AMERICA POLITICAL ACTION COMMITTEE (C00248849)

Apparent Excessive Contributions from Individuals or Committees

Contributor Name	Date	Amount	Report
Kaye, Douglas	7/16/25	\$1,500.00	2025 Year-End
Kaye, Douglas	10/6/25	\$3,900.00	2025 Year-End
Seethapathi, Ram	2/21/25	\$3,900.00	2025 Mid-Year
Seethapathi, Ram	10/17/25	\$1,720.00	2025 Year-End

**Apparent Impermissible, Excessive, and Prohibited Contributions
CROPLIFE AMERICA POLITICAL ACTION COMMITTEE (C00248849)**

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
Anderson, Darren Ph.D.	8/15/25	\$500.00	2025 Year-End