



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 12, 2017

DAN BACKER, TREASURER
GREAT AMERICA PAC
107 S WEST ST SUITE 555
ALEXANDRIA, VA 22314

Response Due Date
05/17/2017

IDENTIFICATION NUMBER: C00608489

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/20/2016 -
11/28/2016), RECEIVED 02/21/2017

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. Schedule A supporting Line 11(a)(i) (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 52 U.S.C. §30116(f) (formerly 2 U.S.C. §441a(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 "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 <http://www.fec.gov/pages/fecrecord/november2011/fecstatementcareyvfec.shtml>

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

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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 in writing and provide a photocopy of your check for any transfer-out or refund. 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.

2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s) paid to firms: "Carey Acct:", "Carey Acct: Reimbursement (See Below)", "Carey Acct: Reimbursements (See Below)", and "Carey Acct: Staff Services." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

3. Schedule B supporting Line 29 discloses disbursements to credit card companies. When reporting these payments, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, you must itemize the name of the original vendor, address, date, amount, and purpose as a memo entry as well as clearly identify the credit card payment to which each memo entry relates.

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Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR § 104.9)

4. Schedule E of your report indicates that your committee may have failed to file one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, refunds of contributions to individuals should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 28(a) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

- Schedule B of your report discloses an expenditure(s) for "Advertising Materials", "Carey Acct: Online Ads", "Carey Acct: Phone Advocacy", and "Postage." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this may constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) or 29 of the Detailed Summary Page.

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

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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 additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should 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) 694-1133.

Sincerely,



Christopher Morse
Senior Campaign Finance Analyst
Reports Analysis Division

Excessive Contributions
Great America PAC (C00608489)

Excessive Contributions from Individuals

Contributor Name	Date	Amount	Report
BOBROW, NORMAN	10/28/2016	\$25,000.00	2016 30 Day Post General
CHAMBERS, NORMAN	8/15/2016	\$5,000.00	2016 September Monthly
CHAMBERS, NORMAN	10/29/2016	\$2,500.00	2016 30 Day Post General
CHATTERJEE, ELLEN	8/12/2016	\$1,000.00	2016 September Monthly
CHATTERJEE, ELLEN	10/25/2016	\$5,000.00	2016 30 Day Post General
ELLIOTT, BEVERLY BABB	8/19/2016	\$5,000.00	2016 September Monthly
ELLIOTT, BEVERLY BABB	11/4/2016	\$1,000.00	2016 30 Day Post General
FARR, DAVID	10/28/2016	\$5,000.00	2016 30 Day Post General
FARR, DAVID	10/30/2016	\$5,000.00	2016 30 Day Post General
FARR, LELIA	10/28/2016	\$5,000.00	2016 30 Day Post General
FARR, LELIA	10/30/2016	\$10,000.00	2016 30 Day Post General
FAVRE, ART	11/1/2016	\$10,000.00	2016 30 Day Post General
GAST, KENTON	6/3/2016	\$5.00	2016 July Monthly
GAST, KENTON	6/3/2016	\$95.00	2016 July Monthly
GAST, KENTON	6/14/2016	\$500.00	2016 July Monthly
GAST, KENTON	6/22/2016	\$5.00	2016 July Monthly
GAST, KENTON	6/22/2016	\$95.00	2016 July Monthly
GAST, KENTON	6/29/2016	\$5.00	2016 July Monthly
GAST, KENTON	6/29/2016	\$95.00	2016 July Monthly
GAST, KENTON	7/25/2016	\$500.00	2016 August Monthly
GAST, KENTON	7/27/2016	\$1,000.00	2016 August Monthly
GAST, KENTON	8/8/2016	\$500.00	2016 September Monthly
GAST, KENTON	8/12/2016	\$1,000.00	2016 September Monthly
GAST, KENTON	8/16/2016	\$500.00	2016 September Monthly
GAST, KENTON	8/30/2016	\$500.00	2016 September Monthly
GAST, KENTON	8/31/2016	\$100.00	2016 September Monthly
GAST, KENTON	9/13/2016	\$100.00	2016 October Monthly
GAST, KENTON	9/17/2016	\$500.00	2016 October Monthly
GAST, KENTON	10/22/2016	\$25.00	2016 30 Day Post General
HEFFNER, CHANDI	8/16/2016	\$1,000.00	2016 September Monthly
HEFFNER, CHANDI	10/26/2016	\$1,000.00	2016 30 Day Post General
HEFFNER, CHANDI	11/1/2016	\$100.00	2016 30 Day Post General
HEFFNER, CHANDI	11/2/2016	\$2,500.00	2016 30 Day Post General

Excessive Contributions
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HEFFNER, CHANDI	11/4/2016	\$1,008.00	2016 30 Day Post General
HOLMES, LEE	6/30/2016	\$1,000.00	2016 July Monthly
HOLMES, LEE	7/14/2016	\$1,000.00	2016 August Monthly
HOLMES, LEE	7/25/2016	\$250.00	2016 August Monthly
HOLMES, LEE	8/30/2016	\$500.00	2016 September Monthly
HOLMES, LEE	9/23/2016	\$100.00	2016 October Monthly
HOLMES, LEE	9/26/2016	\$250.00	2016 October Monthly
HOLMES, LEE	10/20/2016	\$1,000.00	2016 30 Day Post General
HOLMES, LEE	10/20/2016	\$500.00	2016 30 Day Post General
HOLMES, LEE	10/21/2016	\$250.00	2016 30 Day Post General
HOLMES, LEE	10/23/2016	\$1,000.00	2016 30 Day Post General
HOLMES, LEE	10/26/2016	\$1,000.00	2016 30 Day Post General
HOLMES, LEE	10/28/2016	\$250.00	2016 30 Day Post General
HOLMES, LEE	11/1/2016	\$250.00	2016 30 Day Post General
HOLMES, LEE	11/3/2016	\$250.00	2016 30 Day Post General
HOLMES, LEE	11/7/2016	\$250.00	2016 30 Day Post General
HOLMES, LEE	11/15/2016	\$75.00	2016 30 Day Post General
JENSEN, JOHN	10/25/2016	\$2,500.00	2016 30 Day Post General
JENSEN, JOHN	10/30/2016	\$5,000.00	2016 30 Day Post General
JERNIGAN, JOHNNY	10/20/2016	\$5,000.00	2016 30 Day Post General
JERNIGAN, JOHNNY	10/25/2016	\$500.00	2016 30 Day Post General
JERNIGAN, JOHNNY	10/26/2016	\$250.00	2016 30 Day Post General
JERNIGAN, JOHNNY	10/28/2016	\$100.00	2016 30 Day Post General
JERNIGAN, JOHNNY	10/30/2016	\$250.00	2016 30 Day Post General
JERNIGAN, JOHNNY	11/3/2016	\$500.00	2016 30 Day Post General
KIMMELMAN, DOUGLAS	11/4/2016	\$50,000.00	2016 30 Day Post General
MURPHY, PETER	6/23/2016	\$5,000.00	2016 July Monthly
MURPHY, PETER	10/31/2016	\$500.00	2016 30 Day Post General
NOLL, JOHN D	10/20/2016	\$2,500.00	2016 30 Day Post General
NOLL, JOHN D	10/28/2016	\$2,500.00	2016 30 Day Post General
NOLL, JOHN D	10/29/2016	\$2,500.00	2016 30 Day Post General
NOLL, JOHN D	11/7/2016	\$1,000.00	2016 30 Day Post General
ROA, ZOE	10/31/2016	\$15,000.00	2016 30 Day Post General
ROGERS, THOMAS	6/22/2016	\$5,000.00	2016 July Monthly
ROGERS, THOMAS	10/21/2016	\$1,500.00	2016 30 Day Post General

Excessive Contributions
Great America PAC (C00608489)

ROSENZWEIG, SAUL	10/27/2016	\$5,000.00	2016 30 Day Post General
ROSENZWEIG, SAUL	10/27/2016	\$5,000.00	2016 30 Day Post General
SLAUGHTER, JAMES	7/15/2016	\$1,000.00	2016 August Monthly
SLAUGHTER, JAMES	9/26/2016	\$1,000.00	2016 October Monthly
SLAUGHTER, JAMES	10/13/2016	\$1,000.00	2016 30 Day Post General
SLAUGHTER, JAMES	10/20/2016	\$1,000.00	2016 30 Day Post General
SLAUGHTER, JAMES	10/31/2016	\$5,000.00	2016 30 Day Post General
SLAUGHTER, JAMES	11/23/2016	\$3,000.00	2016 30 Day Post General
THEBERGE, BARBARA	6/24/2016	\$5,000.00	2016 July Monthly
THEBERGE, BARBARA	9/26/2016	\$1,000.00	2016 October Monthly
THEBERGE, BARBARA	11/4/2016	\$250.00	2016 30 Day Post General
TOPPER, LEWIS	10/27/2016	\$25,000.00	2016 30 Day Post General
VETOS, ROSEMARY	10/25/2016	\$1,000.00	2016 30 Day Post General
VETOS, ROSEMARY	11/1/2016	\$5,000.00	2016 30 Day Post General
WALLACE, BEATRICE C	11/11/2016	\$25,000.00	2016 30 Day Post General
WARREN, ELIZABETH	11/21/2016	\$500.00	2016 30 Day Post General
WARREN, ELIZABETH	11/23/2016	\$5,000.00	2016 30 Day Post General
WILLIAMS, GRANT	10/31/2016	\$10,000.00	2016 30 Day Post General

Missing 48 Hour Report (Schedule E)
Great America PAC (C00608489)

Name of Payee	Dissemination Date	Amount	Candidate	Election
OSWALT, SCOTT	9/1/16	\$1,251.36	TRUMP, DONALD J	G2016
RHA MARKETING	9/12/16	\$6,011.58	TRUMP, DONALD J	G2016