



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 24, 2021

JASON PALLANTE, TREASURER
AMERICA GREAT PAC
1420 NORTH ST., NW
WASHINGTON, DC 20005

Response Due Date
11/29/2021

IDENTIFICATION NUMBER: C00705384

REFERENCE: AMENDED MID-YEAR REPORT (01/01/2021 - 06/30/2021), RECEIVED
10/15/2021

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. Your amended report discloses an increase in disbursements totaling \$137,019.40 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)
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): "Administrative Services" and "contractor." 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 <https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>

3. Schedule B of your report discloses reimbursements to individuals for "payroll, rent, utilities." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which

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reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §§104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

4. Your Statement of Organization (FEC Form 1) indicates that your committee is an Independent Expenditure-Only Political Committee and will not use its funds to make contributions, whether direct, in-kind or via coordinated communications, to federal candidates or committees. However, Schedule B (see attached) discloses one or more contributions to federal candidates and/or committees.

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

If you have made a contribution to a federal candidate or committee, you must request a refund of the contribution within 30 days of the treasurer's receipt.

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 refund request(s) sent to each 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.

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

- 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, other federal operating expenses should be properly disclosed on a separate Schedule(s) B, supporting Line(s) 21(b) 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) and FORM 3X Instructions)

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

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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) 694-1294.

Sincerely,

A handwritten signature in cursive script that reads "Jamie Timmie". The signature is written in black ink and is positioned above the printed name and title.

Jamie Timmie
Senior Campaign Finance Analyst

**Apparent Impermissible, Excessive, and Prohibited Contributions
America Great PAC (C00705384)**

Apparent Excessive Contributions PAC to PAC/ PAC to National Party

Recipient Name	Date	Amount	Report
Best Buy Co., Inc. Employee Political Forum	4/5/2021	\$2,482.27	2021 Mid-Year
Best Buy Co., Inc. Employee Political Forum	4/7/2021	\$10,826.99	2021 Mid-Year
Paypal PAC	2/23/21	\$397.54	2021 Mid-Year