



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

February 15, 2022

MARK SHELTON, TREASURER  
BARCLAYS GROUP US INC. POLITICAL  
ACTION COMMITTEE  
2099 PENNSYLVANIA AVE. NW SUITE 410  
WASHINGTON, DC 20006

**Response Due Date**  
**03/22/2022**

IDENTIFICATION NUMBER: C00448852

REFERENCE: YEAR-END REPORT (07/01/2021 - 12/31/2021)

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 1 item(s):

- Schedule A (see attached) discloses a contribution(s) from an individual(s) who has a mailing address outside of the United States of America. 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.

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

BARCLAYS GROUP US INC. POLITICAL ACTION COMMITTEE

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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.

**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](http://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](http://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) 694-1295.

Sincerely,



Jeremiah Hempel

Senior Campaign Finance Analyst

**Apparent Impermissible, Excessive, and Prohibited Contributions  
Barclays Group US Inc. Political Action Committee (C00448852)**

**Contributions from Possible Foreign Nationals**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
Albrecht, Stephen	7/23/21	\$401.21	2021 Year-End
Albrecht, Stephen	8/23/21	\$397.94	2021 Year-End
Albrecht, Stephen	9/23/21	\$397.24	2021 Year-End
Albrecht, Stephen	10/22/21	\$402.11	2021 Year-End
Albrecht, Stephen	11/23/21	\$390.62	2021 Year-End
Albrecht, Stephen	12/16/21	\$386.33	2021 Year-End
Compton, Paul H	7/23/21	\$401.24	2021 Year-End
Compton, Paul H	8/23/21	\$397.94	2021 Year-End
Compton, Paul H	9/23/21	\$397.24	2021 Year-End
Compton, Paul H	10/22/21	\$402.11	2021 Year-End
Compton, Paul H	11/23/21	\$390.62	2021 Year-End
Compton, Paul H	12/16/21	\$386.33	2021 Year-End
Fitzwater, Matthew	7/23/21	\$401.21	2021 Year-End
Fitzwater, Matthew	8/23/21	\$397.94	2021 Year-End
Fitzwater, Matthew	9/23/21	\$397.24	2021 Year-End
Fitzwater, Matthew	10/22/21	\$402.14	2021 Year-End
Fitzwater, Matthew	11/23/21	\$390.62	2021 Year-End
Fitzwater, Matthew	12/16/21	\$386.33	2021 Year-End