



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 28, 2021

JAMES HUFFINES, TREASURER
BROOKDALE SENIOR LIVING PAC
111 WESTWOOD PLACE SUITE 400
BRENTWOOD, TN 37027

Response Due Date
03/04/2021

IDENTIFICATION NUMBER: C00459008

REFERENCE: 30 DAY POST-GENERAL REPORT (10/15/2020 - 11/23/2020)

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 B supporting Line 23 discloses one or more contributions to a candidate(s) for the 2020 General election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund or redesignation request) for each

BROOKDALE SENIOR LIVING PAC

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contribution. The committee should retain for its records copies of the refund and/or redesignation request(s) sent to the 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. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) 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) 694-1185.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Beckman". The signature is fluid and cursive, with the first name "Michael" and last name "Beckman" clearly distinguishable.

Michael Beckman
Senior Campaign Finance Analyst

Apparent Impermissible Contributions
BROOKDALE SENIOR LIVING PAC (C00459008)

Apparent Contributions Made After Election Date

Recipient Name	Date	Amount	Election	Election Date
CARPER FOR SENATE	11/18/20	\$2,000.00	G2020	11/3/2020
COLLINS FOR SENATOR	11/18/20	\$2,000.00	G2020	11/3/2020
EMMER FOR CONGRESS	11/18/20	\$2,000.00	G2020	11/3/2020
FAMILIES FOR JAMES LANKFORD	11/18/20	\$2,000.00	G2020	11/3/2020
FRIENDS OF MARK WARNER	11/18/20	\$2,000.00	G2020	11/3/2020
SINEMA FOR ARIZONA	11/18/20	\$2,000.00	G2020	11/3/2020
SPANBERGER FOR CONGRESS	11/18/20	\$1,000.00	G2020	11/3/2020
TAMMY BALDWIN FOR SENATE	11/18/20	\$2,000.00	G2020	11/3/2020
TINA SMITH FOR MINNESOTA	11/18/20	\$2,000.00	G2020	11/3/2020
WEXTON FOR CONGRESS	11/18/20	\$1,000.00	G2020	11/3/2020