



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 11, 2021

MR. DAVID RAVENELLE, TREASURER
UNITED POSTMASTERS AND MANAGERS OF
AMERICA POLITICAL FUND (UPMA PAC)
8 HERBERT STREET
ALEXANDRIA, VA 22305-2600

Response Due Date
03/18/2021

IDENTIFICATION NUMBER: C00100404

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 3 item(s):

1. Your report discloses an interest receipt(s) from "NFCO- Money Market." This depository has not been previously disclosed on your Statement of Organization. Commission Regulations require that each political committee disclose the name of all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds. Please amend your Statement of Organization to disclose all committee depositories. (11 CFR § 102.2(a)(1)(vi))

2. Schedule B 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(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

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

If any contribution you made exceeds the limits, you must request a refund of the excessive amount 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.

UNITED POSTMASTERS AND MANAGERS OF AMERICA POLITICAL FUND (UPMA
PAC)

Page 2 of 3

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund or redesignation request) for each 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 the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

3. Schedule B of your report discloses a total of \$4,106.44 in payments to your connected organization for "annual PAC appeal". 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 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.

UNITED POSTMASTERS AND MANAGERS OF AMERICA POLITICAL FUND (UPMA
PAC)

Page 3 of 3

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 (RAI), 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) 694-1139.

Sincerely,



Romy Adame-Wilson

Sr. Campaign Finance & Reviewing Analyst

**Apparent Impermissible, Excessive, and Prohibited Contributions
United Postmasters and Managers of America Political Fund (C00100404)**

Apparent Excessive Contributions to a Committee/Candidate Committee

Recipient Name	Date	Amount	Election	Report
Zeldin For Congress	3/27/19	\$1,500.00	*G2020	2019 April Monthly
Zeldin For Congress	6/18/19	\$1,000.00	*G2020	2019 July Monthly
Zeldin For Congress	9/9/19	\$1,000.00	*G2020	2019 October Monthly
Zeldin For Congress	11/1/19	\$600.00	*G2020	2019 December Monthly
Zeldin For Congress	11/12/19	\$600.00	*G2020	2019 December Monthly
Zeldin For Congress	11/20/19	-\$600.00	*G2020	2019 December Monthly
Zeldin For Congress	11/20/19	\$900.00	*G2020	2019 December Monthly
Zeldin For Congress	12/2/19	\$900.00	*G2020	2019 Year End
Zeldin For Congress	2/6/19	-\$900.00	*G2020	2020 March Monthly
Zeldin For Congress	10/15/20	\$500.00	G2020	2020 30 Day Post-General
Ann Wagner For Congress	1/24/20	\$2,500.00	*G2020	2020 February Monthly
Ann Wagner For Congress	7/31/20	\$2,500.00	G2020	2020 August Monthly
Ann Wagner For Congress	10/15/20	\$2,500.00	G2020	2020 30 Day Post-General

*Schedule B of your report discloses this contribution as designated to the 2019 General election; however, this candidate did not participate in a General election in 2019. Therefore, this contribution has been attributed to the next scheduled Federal election for this candidate, the 2020 General election (11 CFR §110.2(b)(ii)).