



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

August 27, 2026

SAMUEL CLARK, TREASURER
KLOBUCHAR FOR MINNESOTA
PO BOX 4146
SAINT PAUL, MN 55104

Response Due Date**10/01/2026**

IDENTIFICATION NUMBER: C00431353

REFERENCE: APRIL QUARTERLY REPORT (01/01/2026 - 03/31/2026)

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):

- It appears that your committee has received money from the sale of campaign assets. Generally, the Commission has viewed the sale of committee assets to be fundraising for political purposes, resulting in contributions subject to the limitations and prohibitions of the Act. (Advisory Opinions 1990-3, 1988-12, and 1983-2)

The Commission has reached this conclusion with respect to the proposed sale of campaign fundraising items or political campaign materials developed uniquely for the committee (such as artwork, publications, and opinion polls). (11 CFR 100.53, Advisory Opinions 1982-24 and 1980-19) Please note the exception for mailing lists below.

The Commission has further reviewed situations where a committee seeks to use its assets to generate income through ongoing business or commercial ventures. The Commission has found these proposals to be merely fundraising in another form and the proceeds are considered to be contributions from the purchasers. (Advisory Opinions 1991-34, 1990-3, 1988-12 and 1983-2)

The Commission has identified limited circumstances under which selling a campaign asset does not result in a contribution from the purchaser. The Commission specifically isolated cases where assets that had been purchased or developed for the committee's own particular use (rather than for sale in campaign fundraising activity) and those assets had ascertainable market value to

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be cases without inherent contribution consequences.

Mailing lists developed by a campaign for its own use may be sold at the "usual and normal" charge without the purchaser making a contribution. (Advisory Opinions 2002-14, 1982-41, and 1981-53)

The Commission has said that the sale of campaign equipment and supplies does not result in a contribution under certain circumstances. (Advisory Opinions 2003-19, 1989-4, and 1986-14)

Please amend your report to provide clarifying information about the nature of the assets sold by your committee reported on Schedule A supporting Line 15 and whether or not these assets were sold at fair market rates.

If any of the contributions you received exceed the limits, you must refund, redesignate, or reattribute (whichever may be applicable depending on the donor) the excessive amount within 60 days of receipt of the contribution. In that case, please inform the Commission of your corrective action promptly by filing an amended report or Miscellaneous Document (Form 99 for electronic filers). If a remedy will be disclosed in a future reporting period, please provide the date and amount of the remedy in your response. The committee should retain records of refunds, redesignations, and/or reattributions of the contributions in question.

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

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press 5 to reach the Reports Analysis Division) or my local number (202) 694-1229.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Schleyer". The signature is fluid and cursive, with a large initial "L" and a trailing flourish.

Lauren Schleyer
Senior Campaign Finance Analyst