



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

July 8, 2025

BRIAN GRAFF, TREASURER
THE AMERICAN SOCIETY OF PENSION
PROFESSIONALS AND ACTUARIES
POLITICAL ACTION COMMITTEE (ASPPA-NAPA
PAC) A/K/A AMERICAN RETIREMENT
ASSOCIATION POLITICAL ACTION
COMMITTEE (ARA PAC)
4401 N. FAIRFAX DRIVE, SUITE 600
ARLINGTON, VA 22203

Response Due Date
08/12/2025

IDENTIFICATION NUMBER: C00333104

REFERENCE: APRIL MONTHLY REPORT (03/01/2025 - 03/31/2025)

Dear Treasurer:

This notice 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 one or more contributions which appears to be from a corporation(s). Please be advised that 52 U.S.C. §30118(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLCs) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations. In the event that the LLC is treated as a partnership under IRS rules, the aforementioned contributions are to be attributed to each member in direct proportion to his or her share of the LLC's profit or by agreement of its members. Each member who has contributed in excess of \$200 for the calendar year should be identified by name, address, amount of contribution, name of employer, occupation and aggregate total on Schedule A. (11 CFR §110.1(g)(1) through (5))

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

THE AMERICAN SOCIETY OF PENSION PROFESSIONALS AND ACTUARIES
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The Commission has approved the use of the following sample donor response form for committees that seek and accept contributions from LLCs to affirm to the recipient committee that the LLC is eligible to make the contribution and to satisfy the "best efforts" obligation to obtain contributor information: <https://www.fec.gov/resources/cms-content/documents/mtgdoc-24-53-A.pdf>

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1))

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund and/or transfer to a non-federal account) for each contribution. The committee should retain for its records copies of refund checks and/or transfers to nonfederal account. In addition, any transfers out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer out or refund the amount 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

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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) 694-1622.

Sincerely,

A handwritten signature in black ink that reads "Aaron Carrell". The signature is written in a cursive, slightly slanted style.

Aaron Carrell
Campaign Finance Analyst

Apparent Impermissible, Excessive, and Prohibited Contributions
THE AMERICAN SOCIETY OF PENSION PROFESSIONALS AND ACTUARIES
POLITICAL ACTION COMMITTEE (ASPPA-NAPA PAC) A/K/A AMERICAN

Contributions from Possible Prohibited Entities (Corporations, Labor Organization, LLCs)

Contributor Name	Date	Amount	Report
VOYA Financial	3/12/25	\$5,000.00	2025 April Monthly