



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 5, 2022

MR. CHRISTOPHER MONTGOMERY WOODFIN, TREASURER  
GREAT AMERICAN PATRIOT PROJECT,  
INC.

1528 COUNTRY CLUB ROAD  
HARRISONBURG, VA 22802

**Response Due Date**  
**07/11/2022**

IDENTIFICATION NUMBER: C00767608

REFERENCE: AMENDED APRIL QUARTERLY REPORT (01/01/2022 - 03/31/2022),  
RECEIVED 04/22/2022

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 2 item(s):

1. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s)

GREAT AMERICAN PATRIOT PROJECT, INC.

Page 2 of 4

was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution,
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following descriptions: "Event Marketing - Setup and Management," "Marketing and Staff - Event Management," "Rally Coordinator," "Reimbursement - Event Expense," "Event Entertainment," "Reimbursement - Event Entertainment," "Entertainment - Event," "Event Management Cost," and "Reimbursement - Performer and Event Staff." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at <https://www.fec.gov/help-candidates-and-committees/purposes-disbursement>

- For your information and consideration when preparing future filings, political committees that have established a federal account and a non-contribution account consistent with the stipulated order in Carey v. FEC should report their activity according to the Commission's interim reporting guidance after notifying the Commission of their intent to do so.

Committee's using a separate non-contribution account should (1) deposit the contributions into a separate bank account for the purpose of financing independent expenditures, other advertisements that refer to a Federal candidate,

GREAT AMERICAN PATRIOT PROJECT, INC.

Page 3 of 4

and generic voter drives, (2) ensure the non-contribution account remain segregated from any accounts that receive source-restricted and amount-limited contributions for the purpose of making contributions to candidates, and (3) ensure each account pay a percentage of administrative expenses that closely corresponds to the percentage of activity for that account.

Receipts and disbursements for each account must be reported pursuant to 52 U.S.C. §30104 and 11 CFR Part 104. Receipts deposited into the non-contribution account should be reported on Schedule A supporting Line 17 with "Non-Contribution Account" disclosed in Memo Text or the description field.

Independent Expenditures paid from the non-contribution account should be disclosed on Schedule E supporting Line 24 with "Non-Contribution Account" disclosed in Memo Text or the description field with the purpose of disbursement.

All other disbursements made from the non-contribution account should be reported on Schedule B, supporting Line 29 with "Non-Contribution Account" disclosed in Memo Text or the description field with the purpose of disbursement.

For more information please see the Commission's interim reporting guidance at <https://www.fec.gov/updates/fec-statement-on-carey-v-fec>.

**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 (RFAI), 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

GREAT AMERICAN PATRIOT PROJECT, INC.

Page 4 of 4

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) 694-1176.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Adamsky", with a long, sweeping underline.

Michael Adamsky  
Senior Campaign Finance Analyst

335