



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

RQ-2

March 2, 2026

GIANNA NAWROCKI, TREASURER  
AMERICAN ASSOCIATION OF ORTHODONTISTS  
POLITICAL ACTION COMMITTEE  
401 N. LINDBERGH BLVD.  
ST. LOUIS, MO 63141

**Response Due Date**  
**04/06/2026**

IDENTIFICATION NUMBER: C00293910

REFERENCE: YEAR-END REPORT (07/01/2025 - 12/31/2025)

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 4 item(s):

1. The totals listed on Lines 7, 23, 31, and 32, Column B of the Summary and Detailed Summary Pages appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b))
2. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (52 U.S.C. §30104(b))
3. Schedule A (see attached) discloses contributions from individuals who have a mailing address outside of the United States of America. Please be advised that 52 U.S.C. §30121(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contributions in question were incompletely or

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incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR §110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action promptly by providing the date of the refund. The committee should retain for its records copies of refund check(s). In addition, any refunds should be disclosed on Schedule B supporting Line 28 (a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contributions, prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

4. Schedule B supporting Line 21(b) of the Detailed Summary Page discloses a payment to "U.S. Bank" with a purpose of "payment for 24169946 - Adrian Smith(See - SCB23)" which appears to correspond with a disbursement to "Adrian Smith For Congress" disclosed on Schedule B supporting Line 23 of the Detailed summary Page. Please be advised that if the disbursement to "Adrian Smith For Congress" represents the disclosure of the ultimate recipient for the disbursement to "U.S. Bank" on Line 21(b), it should be disclosed as a memo entry on Schedule B supporting Line 23 of the Detailed Summary Page. This method of reporting would clarify for the public record the total amount of disbursements and avoid deflating the cash-on-hand amount, as the amount of a memo entry is not included in the total receipts or disbursements for the report. Please amend your report to properly disclose this activity or provide clarifying information.

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- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, federal operating expenditures should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) and FORM 3X Instructions)

**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 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) 694-1175.

Sincerely,



Sarah Vivian

Sr. Campaign Finance & Reviewing Analyst

**Apparent Impermissible, Excessive, and Prohibited Contributions****AMERICAN ASSOCIATION OF ORTHODONTISTS POLITICAL ACTION COMMITTEE  
(C00293910)****Contributions from Possible Foreign Nationals**

| <b>Contributor Name</b> | <b>Date</b> | <b>Amount</b> | <b>Report</b> |
|-------------------------|-------------|---------------|---------------|
| Felty, Trista Dr.       | 12/24/25    | \$3,800.00    | 2025 Year-End |
| Felty, Trista Dr.       | 12/31/25    | \$1,200.00    | 2025 Year-End |
|                         |             |               |               |
| Sherman, Melissa        | 12/8/25     | \$2,500.00    | 2025 Year-End |