



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 4, 2022

JEAN PAUL BRADSHAW, TREASURER
GRAVES FOR CONGRESS
PO BOX 201
PLATTE CITY, MO 64079

Response Due Date
11/08/2022

IDENTIFICATION NUMBER: C00359034

REFERENCE: JULY QUARTERLY REPORT (04/01/2022 - 06/30/2022)

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 6 item(s):

1. Schedule A of your report discloses one or more contributions that appear to be from a corporation(s) and/or labor organization(s) (see attached). 52 U.S.C. § 30118(a) (formerly 2 U.S.C. § 441b(a)) and 11 CFR § 103.3(b) prohibit the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

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

If you have received prohibited contributions, you must make a refund within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(1) and (2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund is made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

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2. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,900 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR § 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if, within 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below.

For reattributions, excessive contributions from individuals can be retained if, within 60 days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount is properly redesignated for a different election. An excessive

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contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(1).

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

3. The totals listed on Line(s) 6(a), 6(b), 6(c), 7(a), 7(b), 7(c), 11(a)(i), 11(a)(ii), 11(a)(iii), 11(b), 11(c), 11(e), 12, 14, 15, 16, 17, 18, 20(c), 20(d), 21 and 22, Column B of the Summary and Detailed Summary Page(s) 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

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be affected by this correction. Note that Column B should reflect only the election cycle-to-date totals (11/4/2020 through 11/8/2022). (52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)) and 11 CFR § 104.3)

4. On Schedule B supporting Line 17 of your report, you have itemized disbursements for which you have failed to include the address and purpose. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))

Additional clarification regarding purposes of disbursement and a non-exhaustive list of acceptable purposes are available on the FEC website at <http://www.fec.gov/help-candidates-and-committees/purposes-disbursement/>.

5. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the following description(s): "Event Expense" and "General Consulting." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement and a non-exhaustive list of acceptable purposes are available on the FEC website at <http://www.fec.gov/help-candidates-and-committees/purposes-disbursement/>.

6. Schedule B supporting Line 17 of your report discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, you must itemize the name of the original vendor, address, date, amount, and purpose as a memo entry as well as clearly identify the credit card payment to which each memo entry relates. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR § 104.9)

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.**

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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 press 5 to reach the Reports Analysis Division) or my local number (202) 694-1171.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Grainger". The signature is fluid and cursive, with the first letter of the last name being a large, stylized "G".

Jessica Grainger

Sr. Campaign Finance & Reviewing Analyst

**Apparent Excessive, Prohibited, and Impermissible Contributions
Graves for Congress (C00359034)**

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Hartley, Gregg	6/7/21	\$2,500.00	P2022
Hartley, Gregg	6/21/22	\$2,500.00	P2022

Apparent Excessive Contributions from Committees

Contributor Name	Date	Amount	Election
Ameren FEDPAC	5/17/21	\$2,500.00	P2022
Ameren FEDPAC	7/23/21	\$2,500.00	P2022
Amren FEDPAC	5/13/22	\$2,500.00	P2022
American Council of Engineering Companies ACEC PAC	5/7/21	\$2,500.00	P2022
American Council of Engineering Companies PAC	6/17/21	\$2,500.00	P2022
ACEC PAC	4/1/22	\$5,000.00	P2022
American Maritime Officers Voluntary Political Action Fund	4/16/21	\$2,500.00	P2022
AMO Voluntary PAC	3/3/22	\$2,500.00	P2022
American Maritime Officers Voluntary Political Action Fund	6/2/22	\$2,500.00	P2022
Burns and McDonnell Inc. PAC	9/27/21	\$5,000.00	P2022
Burns & McDonnell PAC	6/29/22	\$5,000.00	P2022
Ford Motor Company	5/5/21	\$2,500.00	P2022
Ford Motor Company	11/11/21	\$2,500.00	P2022
Ford Motor Company Civic Action Fund	6/27/22	\$2,500.00	P2022
General Dynamics Corporation Political Action Committee (GDC PAC)	5/11/21	\$2,500.00	P2022
General Dynamics Corporation Political Action Committee (GDC PAC)	6/16/21	\$2,500.00	P2022
General Dynamics Corp. PAC	6/28/22	\$1,000.00	P2022
Honeywell International PAC	1/28/22	\$2,500.00	P2022
Honeywell International PAC	2/2/22	\$2,500.00	P2022
Honeywell International PAC	3/29/22	\$2,500.00	P2022
Honeywell International PAC	5/5/22	\$2,500.00	P2022

**Apparent Excessive, Prohibited, and Impermissible Contributions
Graves for Congress (C00359034)**

National Beer Wholesalers Association PAC	6/28/21	\$1,000.00	P2022
National Beer Wholesalers Association PAC	9/14/21	\$1,500.00	P2022
National Beer Wholesalers Association PAC	11/2/21	\$2,500.00	P2022
National Beer Wholesalers Association PAC	6/13/22	\$2,500.00	P2022
Saltchuk Resources, Inc. PAC	12/31/20	\$1,000.00	P2022
Saltchuk Resources, Inc. PAC	9/15/21	\$2,000.00	P2022
Saltchuk Resources, Inc. PAC	12/9/21	\$1,000.00	P2022
Saltchuk Resources, Inc. PAC	3/31/22	\$2,000.00	P2022
Saltchuk Resources, Inc. PAC	4/1/22	\$2,000.00	P2022
Williams Companies PAC	6/8/21	\$5,000.00	P2022
The Williams Companies, Inc. PAC	5/5/22	\$5,000.00	P2022
WSP USA Inc. PAC	9/29/21	\$1,000.00	P2022
WSP USA PAC	5/13/22	\$2,900.00	P2022
WSP USA PAC	5/13/22	\$2,100.00	P2022

Contributions from Possible Prohibited Entities

Contributor Name	Date	Amount	Election
Amplify Credit Union	4/4/22	\$2,500.00	P2022
Midwest Data Center	5/11/22	\$500.00	P2022