



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

RQ-2

April 7, 2024

STEVEN MARTIN, TREASURER  
BANKS FOR SENATE  
PO BOX 11431  
FORT WAYNE, IN 46858-1431

**Response Due Date**  
**05/13/2024**

IDENTIFICATION NUMBER: C00577999

REFERENCE: YEAR-END REPORT (10/01/2023 - 12/31/2023)

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 3 item(s):

1. Schedule B supporting Line 20(a) discloses a refund of a contribution received from Christopher Elmore. However, it appears that your committee did not report the receipt of the original contribution. Please amend the appropriate report(s) to disclose the original contribution or provide clarifying information. (52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)) and 11 CFR § 104.3(a) & (b))
2. Schedule A supporting Line 12 of the Detailed Summary Page(s) of your combined 2023 reports discloses transfer(s) that exceed the sum of memo Schedule A entries (see attached). Please note that the sum of memo Schedule A supporting a transfer(s) from a joint fundraising committee should be greater than or equal to the amount of the transfer(s).

Each participating committee shall report its share for **net** proceeds received from the joint fundraising committee as a transfer-in on Schedule A. A memo Schedule A must be provided to itemize your committee's share of the **gross** contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the election cycle and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. (11 CFR § 102.17(c)(8)(i)(B)) Please amend your report to include the missing Schedule A or provide an explanation for this apparent discrepancy.

BANKS FOR SENATE

Page 2 of 2

3. Schedule A supporting Line 15 discloses a receipt for "See Memo Text" totaling \$39,328.60. This receipt(s) appears to be related to an apparent unauthorized use of Committee funds. The Commission notes your explanation of the unauthorized activity. Please provide any additional information as it becomes available. Although the Commission may take further legal action regarding this apparent improper use of Committee funds, any further clarifying information that you can provide will be taken into consideration. (11 CFR §§ 102.9, 102.15, and 104.3)

**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) 694-1440.

Sincerely,



Patrick Harkins  
Sr. Campaign Finance & Reviewing Analyst

**Joint Fundraising Transfers Exceed Memo Entries  
Banks for Senate (C00577999)**

Banks Victory Fund

<b>Report</b>	<b>Transfers</b>	<b>Memo Entries</b>
2023 April Quarterly	\$56,676.90	\$31,500.00
2023 July Quarterly	\$24,202.44	\$23,700.00
2023 October Quarterly	\$24,280.49	\$26,400.00
<b>Total</b>	<b>\$105,159.83</b>	<b>\$81,600.00</b>