



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 26, 2023

DAVID SCHLESS, TREASURER
AMERICAN SENIORS HOUSING ASSOCIATION
(SENIORS HOUSING PAC)
5225 WISCONSIN AVE., NW SUITE 500
WASHINGTON, DC 20015

Response Due Date
10/31/2023

IDENTIFICATION NUMBER: C00325332

REFERENCE: SEPTEMBER MONTHLY REPORT (08/01/2023 - 08/31/2023)

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 1 item(s):

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(f) prohibits a committee from accepting contributions from a person in excess of \$5,000 per calendar year. For your information, a partnership is included in the definition of "person" under 52 U.S.C. §30101(11).

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

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt you (1) transferred the excessive 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. 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 60 days of receipt, the excessive amount must be refunded.

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

AMERICAN SENIORS HOUSING ASSOCIATION (SENIORS HOUSING PAC)

Page 2 of 3

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 during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), your prompt transfer-out or refund of the excessive amount will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

- 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. 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) 694-1175.

AMERICAN SENIORS HOUSING ASSOCIATION (SENIORS HOUSING PAC)

Page 3 of 3

Sincerely,

A handwritten signature in cursive script that reads "Sarah Vivian". The ink is dark and the signature is fluid.

Sarah Vivian

Sr. Campaign Finance & Reviewing Analyst

Apparent Impermissible, Excessive, and Prohibited Contributions
American Seniors Housing Association (Seniors Housing PAC) (C00325332)

Apparent Excessive Contributions from Partnership

Contributor Name	Date	Amount	Report
CS Capital Advisors LLC	8/28/23	\$10,000.00	2023 September Monthly