



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 29, 2013

DOUGLAS CULKIN, TREASURER
NATIONAL APARTMENT ASSOCIATION
POLITICAL ACTION COMMITTEE
4300 WILSON BLVD SUITE 400
ARLINGTON, VA 22203

Response Due Date
12/03/2013

IDENTIFICATION NUMBER: C00113241

REFERENCE: JUNE MONTHLY REPORT (05/01/2013 - 05/31/2013)

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. Schedule A of your report (see attached) discloses one or more contributions which may have been drawn from corporate accounts. Please be advised that 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from separate segregated funds established by the corporations.

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

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited 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, you may retain the contribution in an account not used to influence federal elections. 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 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1))

Please inform the Commission of your corrective action promptly in writing

NATIONAL APARTMENT ASSOCIATION POLITICAL ACTION COMMITTEE

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and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action on your part to transfer-out or refund any such prohibited contributions will be taken into consideration.

2. Schedule A supporting Line 15 of your report discloses offsets to operating expenditures totaling \$1,470.13 from "NATIONAL APARTMENT ASSOCIATION;" however, your report(s) does not appear to disclose a disbursement to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary. (11 CFR § 104.3(a) & (b))

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. If you should 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) 694-1162.

Sincerely,



David Butler
Senior Campaign Finance Analyst
Reports Analysis Division

Excessive, Prohibited, and Impermissible Contributions
National Apartment Association Political Action Committee (C00113241)

Contributions from Possible Prohibited Entities (Corporations, Labor Organization, LLCs)

Contributor Name	Date	Amount	Report
4 Seasons, LLC	5/24/13	\$36.00	2013 June Monthly
Aspen Village Apts Co., LLC	5/24/13	\$76.00	2013 June Monthly
AT Huntsville, LLC	5/24/13	\$52.00	2013 June Monthly
AW Mobile, LLC	5/24/13	\$112.50	2013 June Monthly
Bent Tree, LLC	5/24/13	\$124.00	2013 June Monthly
BH Huntsville, LLC	5/24/13	\$37.50	2013 June Monthly
BW Trussville, LLC	5/24/13	\$60.00	2013 June Monthly
Colonial Properties Trust	5/17/13	\$2,500.00	2013 June Monthly
DR Knoxville, LLC	5/24/13	\$36.00	2013 June Monthly
EC Huntsville, LLC	5/24/13	\$154.00	2013 June Monthly
Energy Center II, Ltd.	5/24/13	\$28.98	2013 June Monthly
Energy Center Ltd.	5/24/13	\$158.02	2013 June Monthly
Fountain Square, LLC	5/24/13	\$60.00	2013 June Monthly
FP Tuscaloosa LLC	5/24/13	\$77.50	2013 June Monthly
FT Northport, LLC	5/24/13	\$124.00	2013 June Monthly
HD Greenville, LLC	5/24/13	\$251.00	2013 June Monthly
High Country, Ltd.	5/24/13	\$100.00	2013 June Monthly
HP Huntsville, LLC	5/24/13	\$146.00	2013 June Monthly
LB Knoxville, LLC	5/24/13	\$104.00	2013 June Monthly
LE Jackson, LLC	5/24/13	\$72.00	2013 June Monthly
MA Huntsville, LLC	5/24/13	\$197.00	2013 June Monthly
MG Huntsville, LLC	5/24/13	\$89.00	2013 June Monthly
Mosley Apartment Company	5/24/13	\$33.50	2013 June Monthly
Mountain Brook, LLC	5/24/13	\$180.50	2013 June Monthly
MV Tuscaloosa, LLC	5/24/13	\$110.00	2013 June Monthly
Northbrook Apartments Phase I, Ltd	5/24/13	\$120.00	2013 June Monthly
Northbrook Apts Phase IV	5/24/13	\$70.00	2013 June Monthly
OC Huntsville, LLC	5/24/13	\$100.00	2013 June Monthly
PR Huntsville, LLC	5/24/13	\$102.00	2013 June Monthly
RM Tuscaloosa, LLC	5/24/13	\$100.00	2013 June Monthly
RP Huntsville, LLC	5/24/13	\$80.00	2013 June Monthly
RT Anderson, LLC	5/24/13	\$88.00	2013 June Monthly
RW Mobile, LLC	5/24/13	\$68.00	2013 June Monthly
SA Tuscaloosa, LLC	5/24/13	\$20.00	2013 June Monthly
Sealty Realty Company	5/24/13	\$17.00	2013 June Monthly
SP Mobile, LLC	5/24/13	\$114.00	2013 June Monthly
Stone Creek, LLC	5/24/13	\$280.00	2013 June Monthly
TA Tuscaloosa, LLC	5/24/13	\$10.00	2013 June Monthly
TL Birmingham, LLC	5/24/13	\$92.00	2013 June Monthly
WS Huntsville, LLC	5/24/13	\$244.50	2013 June Monthly