



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 23, 2014

PAULA MACKEY, TREASURER
TARRANT COUNTY REPUBLICAN VICTORY
FUND
2405 GRAVEL DRIVE
FORT WORTH, TX 76118

Response Due Date
05/28/2014

IDENTIFICATION NUMBER: C00406645

REFERENCE: APRIL MONTHLY REPORT (03/01/2014 - 03/31/2014)

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 H3 of your report discloses a transfer(s) in from a non federal account(s) for "2014 Lincoln Day Dinner (02/08/2014)" which appears to exceed the permissible amount(s) indicated by your allocation ratio for this activity/event. Please be advised that transfers for allocated activity must not exceed the non federal share of the joint disbursements and that these transfers must be made within a 70 day time period: no more than 10 days before or 60 days after payment to the vendor. Please clarify the nature of this transfer(s) in from the non federal account. (11 CFR §§106.6(e)(2) and 106.7(f)(2))

The Commission recommends that you immediately transfer the total excessive amount received by your federal account back to your non federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

2. Schedule H4 discloses 100% non-federal activity. Please be advised that by definition, this activity does not qualify as an expense(s) that can be allocated between your federal and non-federal accounts. If the disbursements were for operating expenditures paid for with 100% federal funds, they should be itemized on Schedule B for Line 21(b) of the Detailed Summary Page. If these expenses were permissibly paid for with 100% non-federal funds, they should not be disclosed on Schedule H4. Further, any reimbursement from your

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committee's non-federal account for any portion of this activity is not permissible and must be returned. (11 CFR §102.5(a)(1)(i)) Please amend your report to clarify this discrepancy.

- For your information and consideration when preparing future filings, Schedule H4 of your report discloses activity which is paid for with 100% federal funds. For future filings, please be advised that any activity which is financed entirely by the federal account (including administrative expenses), should be reported on Schedule B supporting Line 21(b). (11 CFR §§104.10 and 104.17) For your next filing, please refer to the instructions for each line when determining the proper categorization(s).

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) 694-1147.

Sincerely,



Maureen Benitz
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division