



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 12, 2021

ELIZABETH GRAHAM, TREASURER
TEXAS RIGHT TO LIFE POLITICAL ACTION C
4500 BISSONNET ST. SUITE 305
BELLAIRE, TX 77401

Response Due Date
05/17/2021

IDENTIFICATION NUMBER: C00419242

REFERENCE: 12 DAY PRE-GENERAL REPORT (10/01/2020 - 10/14/2020)

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. The beginning cash balance of this report does not equal the ending balance of your October Quarterly Report (7/1/20 - 9/30/20). Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (52 U.S.C. §30104(b))
2. The totals listed on Line(s) 6(c), 7, 18(a), 18(c), 19, 21(b), 21(c), 31, and 32, 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 be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b))
3. Schedule H3 of your report discloses transfers-in totaling \$25,000 from your non-federal account "Public Communications". However, a Schedule H4 has not been filed to disclose any payments for allocable expenses, which is necessary to support such a transfer-in.

Please be advised that transfers for shared activity must be made within a 70-day time period no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) In addition, unless your non-federal account is reimbursing your federal account for allocable activity,

TEXAS RIGHT TO LIFE POLITICAL ACTION C

Page 2 of 3

the transfer-in of funds from a non-federal account is prohibited by 11 CFR §102.5(a)(1)(i) Please clarify the nature of this transfer-in from the non-federal account.

The Commission recommends that you immediately transfer the impermissible funds 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.

- 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). Any activity which is 100% non-federal and permissibly financed entirely by the non-federal account, should not be disclosed on the FEC Form 3X (11 CFR §104.10)

For your information and consideration when preparing future filings, Separate Segregated Funds and Nonconnected committees that have established a federal account and a non-federal account may pay administrative expenses, costs for generic voter drives and expenses related to public communications referencing any political party from their federal account, or allocate between their federal and non-federal accounts. Committees that choose to allocate these expenses must disclose the allocation ratio to be applied to each category of activity on a Schedule H1.

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for allocated activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non-federal account(s) to pay the non-federal share of allocable expenses.

Any expenditures made on behalf of both federal and non-federal candidates (including in-kind contributions and independent expenditures) must be allocated between your committee's federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. (11 CFR §106.1(a))

For your next filing, please refer to the instructions for each line and schedule 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

TEXAS RIGHT TO LIFE POLITICAL ACTION C

Page 3 of 3

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 (RAI), 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) 694-1144.

Sincerely,

A handwritten signature in black ink that reads "Terez Ray". The signature is written in a cursive, flowing style.

Terez Ray
Senior Campaign Finance Analyst