



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 13, 2017

CHET RUCINSKI, TREASURER
WISCONSIN RIGHT TO LIFE VICTORY
FUND
5317 N. 118TH COURT
MILWAUKEE, WI 53225

Response Due Date
05/18/2017

IDENTIFICATION NUMBER: C00613091

REFERENCE: AMENDED JULY QUARTERLY REPORT (04/01/2016 - 06/30/2016),
RECEIVED 02/01/2017

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 E of your report indicates that your committee may have failed to file one or more of the required 24 hour report(s) regarding "last minute" independent expenditures (see attached). A political committee must file a 24 hour report with the Federal Election Commission as specified in 11 CFR §104.4(c), within 24 hours of any independent expenditures of \$1,000 or more with respect to a given election, made between two and twenty days before an election. The report must be received by the Commission by 11:59 p.m. on the day following the date on which independent expenditures that aggregate \$1,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))
2. Your committee has filed 24 hour reports for independent expenditures supporting "CRUZ TED" (see attached) which have not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 24 hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual

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payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

3. Schedule E supporting Line 24 of your report discloses an independent expenditure(s) on behalf of CRUZ, RAFAEL EDWARD 'TED' which appears to have been publicly disseminated or distributed after the primary date(s) in the respective state(s). Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. When the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the independent expenditures disclosed after the primary date(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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1185.

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Sincerely,

A handwritten signature in black ink that reads "Samantha Hay". The signature is written in a cursive style with a large, prominent 'H'.

Samantha Hay
Campaign Finance Analyst
Reports Analysis Division

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Missing 24 Hour Report (Schedule E)
Wisconsin Right to Life Victory Fund (C00613091)

Name of Payee	Dissemination Date	Amount	Candidate	Election
JoePerri.com LLC	3/28/16	\$105.00	CRUZ, RAFAEL EDWARD 'TED'	P2016

Missing Schedule E (24 Hour Report)
Wisconsin Right to Life Victory Fund (C00613091)

Name of Payee	Dissemination Date	Amount	Candidate	Election
Wisconsin Right to Life Victory Fund	*4/1/16	\$5,656.33	Cruz Ted	P2016
Wisconsin Right to Life Victory Fund	**4/4/16	\$6,026.94	Cruz Ted	P2016

*The transactions above appear on two 24 Hour Reports (filed on 4/2/16 and 2/1/17), but only once on Schedule E of this report.

**The transaction above appears on two 24 Hour Reports (filed on 4/5/16 and 2/1/17), but only once on Schedule E of this report.