



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 05, 2018

ROBERT PARKER SHEFFY, TREASURER  
HOUSTON GLBT POLITICAL CAUCUS PAC  
PO BOX 66664  
HOUSTON, TX 77266-6664

**Response Due Date**  
**12/10/2018**

IDENTIFICATION NUMBER: C00558288

REFERENCE: JULY QUARTERLY REPORT (04/01/2018 - 06/30/2018)

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 enforcement action.** Additional information is needed for the following 4 item(s):

1. The beginning cash balance of this report does not equal the ending balance of your April Quarterly Report (1/1/18 -3/31/18). Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)(1)))
2. The totals listed on Line(s) 6(c), 7, 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 19, 20, 21(a)(ii), 21(c), and 31, 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) (formerly 2 U.S.C. § 434(b)))
3. Schedule A of your report discloses a receipt(s) of \$3,500 from the "Houston GLBT Political Caucus State PAC". Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer out. In addition, the transfer out should be disclosed on Schedule B supporting Line 22 of your next report.

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If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration. (52 U.S.C. §30118(a) (formerly 2 U.S.C. §441b(a)) & 11 CFR §103.3(b)(1) and (2))

4. Schedule B supporting Line 22 discloses disbursements to a non-federal account (see attached). You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of these disbursements were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in kind contributions on Schedule B supporting Line 23, or as independent expenditures on Schedule E supporting Line 24. (11 CFR §§104.3(b)(3) and 106.1)

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

**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

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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) 694-1169.

Sincerely,



Kevin Fortkiewicz  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

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**Impermissible, Excessive, and Prohibited Contributions**  
**HOUSTON GLBT POLITICAL CAUCUS PAC (C00558288)**

**Payments to Non Federal Account**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
Houston GLBT Political Caucus State PAC	5/30/18	\$1,358.05	2018 July Quarterly