

ANDREWS
ATTORNEYS **KURTH** LLP

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Andrews & Kurth L.L.P.
600 Travis, Suite 4200
Houston, Texas 77002
713.220.4200 Phone
713.220.4285 Fax

Kathleen Bethune
713.220.3920 Direct
713.238.7217 Fax
kathleenbethune@andrewskurth.com

April 22, 2014

BY OVERNIGHT MAIL

Federal Election Commission
ATTENTION: Ms. Maureen Benitz
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division
999 E. Street, N.W.
Washington, DC 20463

Re: *FEC Committee ID #C00089540*
Andrews & Kurth Federal PAC

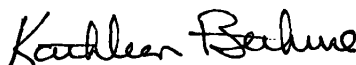
Dear Ms. Benitz:

In response to your letter of April 3, 2014 regarding our January 31 Year End Report (10/01/2013 - 12/31/2013) (copy attached), enclosed please find an *Amended* FEC Form 3X (first 5 pages) for the period from October 1, 2013 through December 31, 2013.

I represent that I am the duly appointed treasurer and have authority as such to sign FEC reports for the above Committee.

Please contact me if you have any questions. Thank you for your assistance in this matter.

Very truly yours,



Kathleen Bethune
Treasurer

Enclosures

14031224844



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 3, 2014

KATHLEEN BETHUNE, TREASURER
ANDREWS & KURTH FEDERAL PAC
600 TRAVIS SUITE 4200
HOUSTON, TX 77002

Response Due Date

05/08/2014

IDENTIFICATION NUMBER: C00089540

REFERENCE: YEAR-END REPORT (10/01/2013 - 12/31/2013)

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. The totals listed on Line(s) 6(c), Column B of the 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. (2 U.S.C. § 434(b))
2. Line 6(c), Column B of the Summary Page does not equal Line 19, Column B of the Detailed Summary Page. Please amend your report to correct this discrepancy. (11 CFR § 104.3(c))

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)

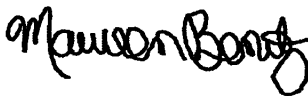
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ANDREWS & KURTH FEDERAL PAC

Page 2 of 2

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

14031224846

**FEC
FORM 3X**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

RECEIVED
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1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

ANDREWS & KURTH FEDERAL PAC

ADDRESS (number and street)

600 TRAVIS

Suite 4200

Houston

TX

77002-2909

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C00089540

3. IS THIS
REPORT

☐

NEW
(N)

OR

☒

AMENDED
(A)

4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

- ☐ April 15
Quarterly Report (Q1)
- ☐ July 15
Quarterly Report (Q2)
- ☐ October 15
Quarterly Report (Q3)
- ☒ January 31
Year-End Report (YE)
- ☐ July 31 Mid-Year
Report (Non-election
Year Only) (MY)
- ☐ Termination Report
(TER)

(b) Monthly
Report
Due On:

- ☐ Feb 20 (M2)
- ☐ Mar 20 (M3)
- ☐ Apr 20 (M4)

- ☐ May 20 (M5)
- ☐ Jun 20 (M6)
- ☐ Jul 20 (M7)

- ☐ Aug 20 (M8)
- ☐ Sep 20 (M9)
- ☐ Oct 20 (M10)

- ☐ Nov 20 (M11)
(Non-Election
Year Only)
- ☐ Dec 20 (M12)
(Non-Election
Year Only)
- ☐ Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

☐

Primary (12P)

☐

General (12G)

☐

Runoff (12R)

☐

Convention (12C)

☐

Special (12S)

Election on

MM / DD / YYYY

in the
State of

XX

(d) 30-Day
POST-Election
Report for the:

☐

General (30G)

☐

Runoff (30R)

☐

Special (30S)

Election on

MM / DD / YYYY

in the
State of

XX

5. Covering Period

MM / DD / YYYY
10 / 01 / 2013

through

MM / DD / YYYY
12 / 31 / 2013

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer KATHLEEN BETHUNE

Signature of Treasurer

Kathleen Bethune

Date

MM / DD / YYYY
04 / 22 / 2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
Only

FEC FORM 3X
Rev. 12/2004

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 02/2003)

Page 2

Write or Type Committee Name

ANDREWS + KURTH

Report Covering the Period:

From:

10 / 01 / 2013

To:

12 / 31 / 2013

**COLUMN A
This Period**

**COLUMN B
Calendar Year-to-Date**

6. (a) Cash on Hand
January 1, **2013**

6584.43

(b) Cash on Hand at
Beginning of Reporting Period.....

6584.43

(c) Total Receipts (from Line 19)

10000.00

10000.00

(d) Subtotal (add Lines 6(b) and
6(c) for Column A and Lines
6(a) and 6(c) for Column B).....

16584.43

16584.43

7. Total Disbursements (from Line 31)

10500.00

10500.00

8. Cash on Hand at Close of
Reporting Period
(subtract Line 7 from Line 6(d))

6084.43

6084.43

9. Debts and Obligations Owed TO
the Committee (Itemize all on
Schedule C and/or Schedule D)

-0-

10. Debts and Obligations Owed BY
the Committee (Itemize all on
Schedule C and/or Schedule D)

-0-



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

**Federal Election Commission
999 E Street, NW
Washington, DC 20463**

**Toll Free 800-424-9530
Local 202-694-1100**

14031224848

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 06/2004)

Page 3

Write or Type Committee Name

ANDREWS & KURTH FEDERAL PAC

Report Covering the Period:

From:

10 / 01 / 2013

To:

12 / 31 / 2013

I. Receipts

COLUMN A
Total This Period

COLUMN B
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other

Than Political Committees

(i) Itemized (use Schedule A).....

1,000.00

1,000.00

(ii) Unitemized.....

-0-

-0-

(iii) TOTAL (add

Lines 11(a)(i) and (ii).....▶

-0-

-0-

(b) Political Party Committees.....

-0-

-0-

(c) Other Political Committees

(such as PACs).....

-0-

-0-

(d) Total Contributions (add Lines

11(a)(iii), (b), and (c)) (Carry

Totals to Line 33, page 5).....▶

1,000.00

1,000.00

12. Transfers From Affiliated/Other

Party Committees.....

-0-

-0-

13. All Loans Received.....

-0-

-0-

14. Loan Repayments Received.....

-0-

-0-

15. Offsets To Operating Expenditures

(Refunds, Rebates, etc.)

(Carry Totals to Line 37, page 5).....

-0-

-0-

16. Refunds of Contributions Made

to Federal Candidates and Other

Political Committees.....

-0-

-0-

17. Other Federal Receipts

(Dividends, Interest, etc.).....

-0-

-0-

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account

(from Schedule H3).....

-0-

-0-

(b) Levin Funds (from Schedule H5).....

-0-

-0-

(c) Total Transfers (add 18(a) and 18(b))..

-0-

-0-

19. Total Receipts (add Lines 11(d),

12, 13, 14, 15, 16, 17, and 18(c)).....▶

1,000.00

1,000.00

20. Total Federal Receipts

(subtract Line 18(c) from Line 19).....▶

-0-

-0-

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	-0-	-0-
(ii) Non-Federal Share.....	-0-	-0-
(b) Other Federal Operating Expenditures	-0-	-0-
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	-0-	-0-
22. Transfers to Affiliated/Other Party Committees.....	-0-	-0-
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	10,500.00	10,500.00
24. Independent Expenditures (use Schedule E)	-0-	-0-
25. Coordinated Party Expenditures (2 U.S.C. §441a(d)) (use Schedule F).....	-0-	-0-
26. Loan Repayments Made.....	-0-	-0-
27. Loans Made.....	-0-	-0-
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	-0-	-0-
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs).....	-0-	-0-
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))	-0-	-0-
29. Other Disbursements	-0-	-0-
30. Federal Election Activity (2 U.S.C. §431(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	-0-	-0-
(ii) "Levin" Share.....	-0-	-0-
(b) Federal Election Activity Paid Entirely With Federal Funds	-0-	-0-
(c) Total Federal Election Activity (add .. Lines 30(a)(i), 30(a)(ii) and 30(b))....	-0-	-0-
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	10,500.00	10,500.00
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	-0-	-0-

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 02/2003)

Page 5

III. Net Contributions/Operating Ex- penditures

COLUMN A Total This Period

COLUMN B Calendar Year-to-Date

- 33. Total Contributions (other than loans)
(from Line 11(d), page 3)
- 34. Total Contribution Refunds
(from Line 28(d))
- 35. Net Contributions (other than loans)
(subtract Line 34 from Line 33)
- 36. Total Federal Operating Expenditures
(add Line 21(a)(i) and Line 21(b))▶
- 37. Offsets to Operating Expenditures
(from Line 15, page 3).....
- 38. Net Operating Expenditures
(subtract Line 37 from Line 36)▶

1000000
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MAUREEN BENITZ

Andrews North LLP

800 Travis St #4200

HOUSTON TX 77002

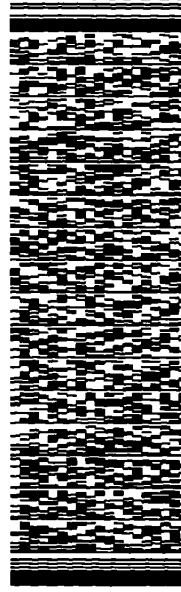
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To Attn: Ms. Maureen Benitz
FEDERAL ELECTION COMMISSION
999 E. Street, N.W.

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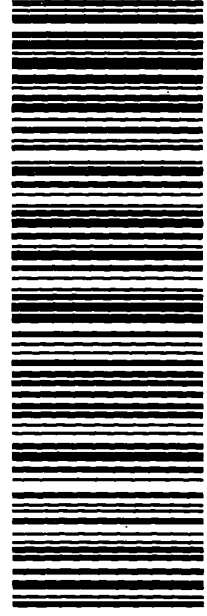


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