



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

April 11, 2012

JONATHAN MARTIN, TREASURER  
CAMPAIGN FOR PRIMARY ACCOUNTABILITY  
INC  
3900 ESSEX LANE, SUITE 250  
HOUSTON, TX 77027

**Response Due Date**  
**05/16/2012**

IDENTIFICATION NUMBER: C00502849

REFERENCE: FEBRUARY MONTHLY REPORT (01/01/2012 - 01/31/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 1 item(s):

- Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 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.

The Commission notes the Miscellaneous Electron Submission, received 2/15/12 that states, "For this particular independent expenditure for OH 09 - \$63,838.50, was disseminated unbeknownst to us that it was in fact paid for as an independent expenditure. In other words, the invoice from the vendor was processed and paid without our knowledge that it was triggering what should have been flagged as an independent expenditure. Very strict steps and measures have been taken and implemented to ensure future compliance and to avoid this oversight from happening again." Although the Commission may