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2004 NOV -8 A 9:53

November 1, 2004

RE: September 22, 2004 Letter from Maureen Benitz (Copy attached)

The September 22, 2004 Letter from Maureen Benitz, Senior Campaign Finance Analyst, Reports Analysis Division, concerned a \$3,055.00 receipt which the Ohio Right to Life Society, Inc. PAC reported as receiving from Right to Life of Greater Cincinnati on its original July 2004 Quarterly Report.

Right to Life Of Greater Cincinnati has not made any contribution to the Ohio Right to Life Society, Inc. PAC.

The Ohio Right to Life Society, Inc. PAC has filed an amended July Quarterly Report which included the following statement: "Erroneously reported a PAC contribution on line 11(c). Deleted contributions were made from individual contributors, previously reported and itemized with the March Quarterly filing.

Sincerely,

Paula Westwood

Paula Westwood
 Executive Director

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER:		PAGE 6 of 10	
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input checked="" type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16 <input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (if Full)
Ohio Right To Life Society, Inc. PAC

Full Name (Last, First, Middle Initial)
A. Right to Life of Greater Cincinnati
Mailing Address 1802 W. Galbraith Rd.

City State Zip Code
Cincinnati OH 45238

FEC ID number of contributing federal political committee. C

Name of Employer Occupation

Receipt For:
Primary General
Other (specify) *

Aggregate Year-to-Date
3055.00

Date of Receipt
M M D D Y Y Y Y
04 01 2004

Transaction ID: SA11C.8864
Amount of Each Receipt This Period

3055.00

MB

SUBTOTAL of Receipts This Page (optional)

3055.00

TOTAL This Period (last page this line number only)

3055.00

MS-U



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 22, 2004

Right to Life of Greater Cincinnati
1802 W. Galbraith Rd.
Cincinnati, OH 45239

Response Due Date:
October 22, 2004

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act ("the Act") but are not registered with the Commission.

The Act defines a "political committee" to include any committee, club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures for the purpose of influencing any election for federal office aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. §431(4)

A review of the receipts reported by Ohio Right to Life Society Inc PAC indicates that your organization has made expenditures in excess of \$1,000 during calendar year 2004 to influence federal elections. 2 U.S.C. §431(9) and 11 CFR §100.52(a). This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which lists your contributions is attached for your review.

The Commission advises that you must either:

- 1) submit a Statement of Organization and file disclosure reports on FEC FORM 3X (Copies of FEC FORMs 1 and 3X can be downloaded from the FEC website at <http://www.fec.gov>, or requested through the FEC Fax line at (202) 501-3413); or
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence federal elections.

The second alternative must be followed if a) your organization does not wish to register and file disclosure reports; b) the contributions, transfers or expenditures made by your organization were from an account containing corporate or union funds; c) you are a non-federal account of a registered federal committee; or d) the contributions, transfers or expenditures made by your organization were not made in accordance with 11 CFR §102.5(a)(2)(i) through (iii) or 102.6(a)(1)(iv). [11 CFR §102.5(a)(2)(i) through

(iii) states that contributions received by your committee must be designed for federal purposes; contributions must result from a solicitation which expressly states that they will be used in connection with a federal election; and contributors must be informed of the prohibitions and limitations of the Act. 11 CFR §102.6(a)(1)(iv) states that the transfer of funds between affiliated committees or party committees of the same party may only be made from funds which are permissible under the Act.]

If you believe that your organization is not a political committee, or that the Commission is otherwise in error, please submit documentation which will clarify this matter.

Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration. **Please notify the Commission by the response due date noted above of your course of action on this matter.** If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). My local number is (202) 694-1135.

Sincerely,



Maureen Benitz

Senior Campaign Finance Analyst
Reports Analysis Division

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>See</i> PREPARER	11-8-04 DATE PREPARED