



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

RQ-2

November 21, 2023

ROCHELLE WORNARDT, TREASURER
WILLIAMSON COUNTY REPUBLICAN PARTY
FEDERAL PAC
PO 393
ROUND ROCK, TX 78680

Response Due Date
12/26/2023

IDENTIFICATION NUMBER: C00454942

REFERENCE: MID-YEAR REPORT (01/01/2023 - 06/30/2023)

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 1 item(s):

1. Your report discloses a transfer for "Transfer to State Campaign Account" to the "Williamson County Republican Party State Campaign Account" which appears to be a non-federal account of your committee. 11 CFR §§106.6 and 106.7 prohibits a committee's federal account from reimbursing its non-federal account for shared allocable expenses. Also, the non-federal account is prohibited from paying the federal account's share of these expenses. These types of costs must be paid according to the allocation ratio derived from the appropriate method on Schedule H1.

If the transfer in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If your non-federal account has paid any expenditures which should have been allocated, you are advised to correct any non-compliance with 11 CFR §§106.6 and 106.7 and establish procedures to ensure future compliance with allocation regulations.

Although the Commission may take further legal action regarding this improper allocation activity, your prompt action will be taken into consideration.

- Schedule H4 discloses activity which is paid for with 100% non-federal funds. For future filings, please be advised that any activity which is financed entirely by the federal account (including administrative expenses), should be reported on Schedule B supporting Line 21(b). Any activity which is 100% non-federal and

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permissibly financed entirely by the non-federal account, should not be disclosed on the FEC Form 3X (11 CFR §104.17)

For your information and consideration when preparing future filings, state, district and local party committees that make expenditures and disbursements in connection with both federal and non-federal elections for activities that are not federal election activities pursuant to 11 CFR §100.24 may use only funds subject to the prohibitions and limitations of the Act, or they may allocate such expenditures and disbursements between their federal and their non-federal accounts. (11 CFR §106.7(b))

State, district and local party committees may pay administrative, generic voter drive and exempt activity expenses from their federal account, or allocate between their federal and non-federal accounts according to a fixed percentage selected on FEC Schedule H1, except for activity directly attributable to a clearly identified candidate. Such expenses must be paid from the federal account only. (11 CFR §106.7(c)(2))

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for allocated activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non-federal account(s) to pay the non-federal share of allocable expenses.

Any expenditures made on behalf of both federal and non-federal candidates (including in-kind contributions, independent expenditures and coordinated expenditures) must be allocated between your committee's federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. (11 CFR §106.1(a))

For your next filing, please refer to the instructions for each line and schedule when determining the proper categorization(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.**

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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 information about the report review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you 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) 694-1175.

Sincerely,

A handwritten signature in black ink that reads "Sarah Vivian". The signature is written in a cursive, flowing style.

Sarah Vivian

Sr. Campaign Finance & Reviewing Analyst