



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

May 1, 2023

WILLIAM CLINE HOFFMAN, TREASURER
GALVESTON COUNTY REPUBLICAN PARTY
P.O. BOX 3522
GALVESTON, TX 77552

Response Due Date
06/05/2023

IDENTIFICATION NUMBER: C00764159

REFERENCE: AMENDED JULY QUARTERLY REPORT (04/01/2022 - 06/30/2022),
RECEIVED 10/12/2022

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 7 item(s):

1. Your amended report discloses an increase in receipts totaling \$25,425 from the amounts disclosed on your original report. Please amend your report or provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)

Although the Commission may take further legal action concerning this matter, your clarification and any additional clarification you may have will be taken into consideration. 11 CFR §104.3

2. The beginning cash balance of this report does not equal the ending balance of your April Quarterly Report (1/1/22 - 3/31/22). Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (52 U.S.C. §30104(b))

3. The totals listed on Line(s) 6(c), 7, 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 19, 20, 29, 31, and 32, 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))

GALVESTON COUNTY REPUBLICAN PARTY

Page 2 of 5

4. Your report discloses what appear to be cash contributions from several contributors totaling \$20,440. Please be advised that contributions exceeding \$100 must be made by check or other written instrument. (11 CFR §110.4(c)) Please return the amount over \$100 to each contributor and disclose the refunds on the appropriate report(s) or provide clarifying information regarding this activity.

5. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(f) and 11 CFR §110.1(c) prohibit a state, district or local party committee (combined) from receiving any contribution from a person or non-multicandidate political committee in excess of \$10,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund, transfer to a non-federal account and/or reattribution) for each contribution. The committee should retain for its records copies of refund checks, transfers to nonfederal account, and/or letters reattributing the contributions in question. In addition, any reattributions should

GALVESTON COUNTY REPUBLICAN PARTY

Page 3 of 5

be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

6. Schedule A of your report (see attached) discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 52 U.S.C. §§30116(f) and 30118 or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

To the extent that your committee has received prohibited funds, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1))

Please inform the Commission of your corrective action promptly by providing the date and method of your remedy (refund and/or transfer to a non-federal

GALVESTON COUNTY REPUBLICAN PARTY

Page 4 of 5

account) for each contribution. The committee should retain for its records copies of refund checks and/or transfers to nonfederal account. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

7. Schedule B of your report discloses reimbursements to individuals for "Reimbursement for South Shore Harbor Lincoln Reagan Dinner Payment." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §§104.3(b)(3)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

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 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 (RAFI), 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

GALVESTON COUNTY REPUBLICAN PARTY

Page 5 of 5

press 5 to reach the Reports Analysis Division) or my local number(202) 694-1169.

Sincerely,

A handwritten signature in black ink that reads "Kevin Fortkiewicz". The signature is written in a cursive style with a large, prominent "K" and "F".

Kevin Fortkiewicz

Sr. Campaign Finance & Reviewing Analyst

322

**Apparent Impermissible, Excessive, and Prohibited Contributions
GALVESTON COUNTY REPUBLICAN PARTY (C00764159)**

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Report
LEE, CODY	5/11/22	\$14,200.00	2022 July Quarterly
SUCHMOR, THOMAS DR.	4/30/22	\$16,110.00	2022 July Quarterly

Contributions from Possible Unregistered Organizations

Contributor Name	Date	Amount	Report
Friends of Dr. Greg Bonnen PAC	4/7/22	\$5,000.00	2022 July Quarterly
Friends of Larry Taylor	6/6/22	\$5,000.00	2022 July Quarterly