



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

March 25, 2026

JOHN PLISHKA, TREASURER
KEN PAXTON FOR SENATE
110 NORTH AKARD ST PMB #40
DALLAS, TX 75201

Response Due Date
04/29/2026

IDENTIFICATION NUMBER: C00901918

REFERENCE: 12 DAY PRE-PRIMARY REPORT (01/01/2026 - 02/11/2026)

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. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for some of these contributions.

An individual or a political committee other than an authorized committee or a qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$3,500 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f); 11 CFR §§ 110.1(b), (e) and (k), and 102.13(c))

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

Please be reminded that all refunds, redesignations and reattributions must be made within 60 days of receipt of the contribution. To date, one or more of the apparent excessive contributions have not been refunded, redesignated, or

KEN PAXTON FOR SENATE

Page 2 of 4

reattributed.

For reattributions, the funds can be retained if, within 60 days of receipt, the excessive amount was properly reattributed to another person. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written authorization of a reattribution, signed by each contributor, indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount was properly designated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written authorization from the contributor to redesignate the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) the committee redesignates by presumption the excessive portion of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) A contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt, the excessive amount must be refunded. (11 CFR § 103.3(b)(1))

Please inform the Commission of your corrective action promptly by filing an amended report or Miscellaneous Document (Form 99 for electronic filers). If a remedy will be disclosed in a future reporting period, please provide the date and amount of the remedy in your response. The committee should retain records of refunds, redesignations, and/or reattributions of the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the

KEN PAXTON FOR SENATE

Page 3 of 4

Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund or redesignate and/or reattribute the excessive amount will be taken into consideration.

2. Schedule A of your report discloses one or more contributions that appear to be from a limited liability company(ies) (LLC) (see attached). The Commission notes your additional explanation regarding the committee's corrective action taken for all of these contributions. 11 C.F.R. §110.1(g) allows the receipt of contributions from LLCs providing the LLC is treated as a partnership for tax purposes, and has not elected to be treated as a corporation by the Internal Revenue Service (IRS). Both LLCs that claim corporate status and those that are publicly traded would be treated as corporations for FECA purposes.

Please amend your report to clarify if the LLCs in question are treated as partnerships. If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information. 52 U.S.C. § 30116(f) prohibits a candidate for federal office from accepting contributions from a person in excess of \$3,500 per election. A partnership is included in the definition of "person" under 52 U.S.C. § 30101(11).

The Commission has approved the use of the following sample donor response form for committees that seek and accept contributions from LLCs to affirm to the recipient committee that the LLC is eligible to make the contribution and to satisfy the "best efforts" obligation to obtain contributor information: <https://www.fec.gov/resources/cms-content/documents/mtgdoc-24-53-A.pdf>.

If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(2))

Please inform the Commission of your corrective action promptly by filing an amended report or Miscellaneous Document (Form 99 for electronic filers). If a remedy will be disclosed in a future reporting period, please provide the date and amount of the remedy in your response. The committee should retain

KEN PAXTON FOR SENATE

Page 4 of 4

records of refunds of the contributions in question. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund was made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the prohibited amount will be taken into consideration.

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 (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) 694-1151.

Sincerely,



Ryan Furman
Sr. Campaign Finance & Reviewing Analyst

**Apparent Excessive, Prohibited, and Impermissible Contributions
Ken Paxton For Senate (C00901918)**

Apparent Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Aziz, Muhammad	2/10/26	\$7,000.00	P2026
Brown, Talley	1/13/26	\$7,000.00	P2026
Herbst, Karen	4/9/25	\$260.25	P2026
Herbst, Karen	5/9/25	\$260.25	P2026
Herbst, Karen	6/9/25	\$260.25	P2026
Herbst, Karen	7/9/25	\$260.25	P2026
Herbst, Karen	8/9/25	\$260.25	P2026
Herbst, Karen	9/9/25	\$260.25	P2026
Herbst, Karen L.	10/9/25	\$260.25	P2026
Herbst, Karen L.	10/24/25	\$7,000.00	P2026
Herbst, Karen L.	11/9/25	\$260.25	P2026
Herbst, Karen L.	12/9/25	\$260.25	P2026
Herbst, Karen	12/10/25	-\$520.50	
Herbst, Karen L.	12/22/25	-\$3,500.00	P2026
Herbst, Karen L.	1/9/26	\$260.25	P2026
Herbst, Karen L.	2/9/26	\$260.25	P2026
Herbst, Karen L.	2/11/26	-\$260.25	P2026
Isaacson, Rick	4/9/25	\$3,643.56	P2026
Isaacson, Rick	4/21/25	-\$143.56	P2026
Isaacson, Rick	1/21/26	\$3,500.00	P2026
Jackson, William	2/5/26	\$7,000.00	P2026
Ledwell, Steve	12/31/25	\$3,500.00	P2026
Ledwell, Steve	1/28/26	\$14,000.00	P2026
Ledwell, Steve	2/3/26	\$14,000.00	P2026
Lehne, Kathy E.	2/4/26	\$7,000.00	P2026
Rogers, Richard	2/11/26	\$7,000.00	P2026
Sanders, Chelby	2/11/26	\$7,000.00	P2026

**Apparent Excessive, Prohibited, and Impermissible Contributions
Ken Paxton For Senate (C00901918)**

Contributions from Possible Prohibited Entities

Contributor Name	Date	Amount	Election
Lone Star Surgery PLLC	1/28/26	\$7,000.00	P2026
Olivia Ventures LLC	1/23/26	\$7,000.00	P2026