



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 9, 2021

TURNING POINT ACTION
4960 EAST BEVERLY
PHOENIX, AZ 85044

Response Due Date
03/16/2021

IDENTIFICATION NUMBER: C90019597

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2020 - 09/30/2020)

Dear Filer:

This letter is prompted by the Commission's preliminary review of the Report of Independent Expenditures Made and Contributions Received (FEC Form 5) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** Additional information is needed for the following 3 item(s):

1. Line 7 of your FEC Form 5 filing discloses disbursements made for independent expenditure(s). However, no contributions are disclosed on Line 6, "Total Contributions."

Each person (other than a political committee) who made a contribution(s) to your reporting entity during this reporting period, whose contribution(s) had an aggregate amount in excess of \$200 within the calendar year, must be itemized on Schedule 5-A, including their identification information, date, and amount of such contribution(s). In addition, memo text must be used to indicate which of these persons made a contribution in excess of \$200 to your reporting entity for the purpose of furthering any independent expenditure. (52 U.S.C. §§ 30101(13) and 30104 (c)(1), (c)(2)(C)) (See <https://www.fec.gov/updates/fec-provides-guidance-following-us-district-court-decision-crew-v-fec-316-f-supp-3d-349-dc-2018/>.)

Please amend your report to provide the missing information or provide clarifying information.

2. It appears that 48-hour report(s) for the attached independent expenditures was filed late. Please be advised that you are required to file 48-hour reports once you make independent expenditures aggregating \$10,000 or more with respect to a given election any time during the calendar year up to and including the 20th

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day before the election. The report must be received at the Commission 11:59 p.m. Eastern Standard/Daylight Time by the second day after the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$10,000 or more, you must file another 48-hour report disclosing these independent expenditures. (11 CFR § 109.10(c) and (e)) Please provide clarification regarding the timeliness of your 48-hour reporting for the independent expenditures in question. Further, if the date disclosed on your Form 5 was the date of payment, rather than the date of public dissemination or distribution, please provide the date of dissemination or distribution.

In addition, please be advised that you are required to disclose these independent expenditures, along with contribution and disbursement information, on Form 5 as a regularly scheduled quarterly report. (11 CFR § 109.10(b) and (e))

3. Your quarterly report discloses independent expenditures that do not appear on 48-hour reports (see attached).

Please be advised that Commission Regulations require that you file 48-hour reports once you make independent expenditures aggregating \$10,000 or more with respect to a given election during the calendar year up to and including the 20th day before the election. The report must be received at the Commission 11:59 p.m. Eastern Standard/Daylight Time by the second day after the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$10,000 or more, you must file another 48-hour report disclosing these independent expenditures. (11 CFR § 109.10(c) and (e))

In addition, you are required to file 24-hour reports once your independent expenditures aggregate \$1,000 or more after the 20th day but more than 24 hours before 12:01 a.m. of the day of the election. The report must be received at the Commission by 11:59 p.m. Eastern Standard/Daylight Time of the day following the date on which the communication was publicly distributed or otherwise disseminated. In the report, you must include information for all independent expenditures that have not been previously reported. Each time you make subsequent independent expenditures relating to the same election that aggregate \$1,000 or more, you must file another 24-hour report disclosing these independent expenditures. (11 CFR § 109.10(d) and (e))

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Please provide clarification regarding whether 24/48-hour reports were required but not filed. If the date disclosed on your Form 5 was the date of payment, rather than the date of public dissemination or distribution, please provide the date of dissemination or distribution.

Please note, you will not receive an additional notice from the Commission on this matter. Requests for extensions of time in which to respond will not be considered. Failure to comply with the provisions of the Act may result in an enforcement action against the entity. Any response submitted by your entity will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

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) 694-1161.

Sincerely,



Michael Dobi
Sr. Campaign Finance & Reviewing Analyst

Late Filed 48 Hour Reports
Turning Point Action (C90019597)

Name	Date	Amount	Purpose	Candidate
Rally Forge	8/20/20	\$27,926.25	Advertising- Billboard/banner	Biden, Joseph

**Missing 48 Hour Reports
Turning Point Action (C90019597)**

Name	Date	Amount	Purpose	Candidate
Rally Forge	9/3/20	\$413.52	Social Media	Trump, Donald
Rally Forge	9/3/20	\$518.50	Social Media	Biden, Joseph
Blue Roots Marketing	9/5/20	\$1,836.00	Door Hangers	Trump, Donald
Rally Forge	9/5/20	\$3,094.00	Radio Ads	Trump, Donald
Rally Forge	9/9/20	\$2,231.30	Social Media	Trump, Donald
Knight Printing	9/12/20	\$1,444.80	Door Hangers	Trump, Donald