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2022 AUG 16 AM 8:24
10 G Street NE, Suite 600 Washington, DC 20002

August 5, 2022

Debbie Chacona
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, DC 20463
rad@fec.gov

**RE: Correct the Record
Identification Number C00578997**

Dear Ms. Chacona:

My firm represented Correct the Record (CTR), which was registered as a Hybrid PAC with a non-contribution account with the Commission (identification number C00578997).

CTR existed only to engage in the federal election held in 2016; it engaged in no substantive activity after that election. Thus, after the five-year statute of limitations had run from CTR's last election-related activity, *see* 18 U.S.C. § 2462, CTR filed a termination report on April 15, 2022. On April 27, 2022, Scott Bennett, Senior Campaign Finance Analyst, notified CTR's treasurer Elizabeth Cohen via the attached letter that the "filing has been accepted as a valid termination as it meets the conditions set forth in 52 U.S.C. §30103(d) and Section 102.3 of the Commission's Regulations," and that CTR was no longer required to file periodic reports.

On June 22, 2022, you sent a letter to CTR explaining that because CTR "still has an open matter under review (MUR), the status of your committee will be changed back to a quarterly filer." (Note that while the letter was dated May 10th, 2022, it was not electronically mailed until June 22, 2022, and was not posted to CTR's reporting page; because it is not publicly available and was sent to an employee who no longer works with CTR, it was not received by CTR until more recently).

Unfortunately, CTR no longer exists. Its status as a corporation under District of Columbia law has been revoked, and it no longer has a board of directors or a treasurer. While it will maintain records as required by law and by the Commission's letter accepting CTR's termination, it is unable to file new periodic reports.

The Commission has no authority to reverse a committee's termination, or to reject it based on an open matter. 11 C.F.R. § 102.3 merely requires that a committee file a termination report and that it no longer receive contributions or disbursements, or have any outstanding debts or obligations. CTR met that standard, as reflected in the Commission's approval of its termination

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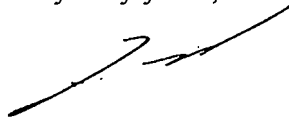
request. Neither that regulation nor the regulation permitting the Commission to administratively terminate a committee, 11 C.F.R. § 102.4, permits the Commission to reverse a committee's termination; and to do so almost two months after approving a termination request creates an undue burden for an organization that was told it could end operations. Moreover, nothing in the Commission's regulations nor in 52 U.S.C. § 30103(d) permits the Commission to take an open matter into account.

We also note that it appears not to be true that CTR has an open matter pending with the Commission, as it has not received a complaint in over five years and any matters would now be time-barred. An open matter that is more than five years old cannot require a committee to file reports with the Commission indefinitely.

CTR no longer exists, having received permission from the Commission to terminate; and it no longer has a treasurer. It cannot file new periodic reports with the Commission.

Please let me know if you have any questions.

Very truly yours,



Ezra W. Reese

EWR/crg
Attachment

2025 RELEASE UNDER E.O. 14176



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-K

April 27, 2022

ELIZABETH COHEN, TREASURER
CORRECT THE RECORD
455 MASSACHUSETTS AVENUE NW STE. 660
WASHINGTON, DC 20001

IDENTIFICATION NUMBER: C00578997

REFERENCE: TERMINATION REPORT (01/01/2022 - 03/31/2022)

Dear Treasurer:

Your committee's filing has been accepted as a valid termination as it meets the conditions set forth in 52 U.S.C. §30103(d) and Section 102.3 of the Commission's Regulations. Your committee is no longer required to file reports on a periodic basis. However, 52 U.S.C. §30102(d) and Sections 102.9(c) and 104.14(b)(3) of the Commission's Regulations require that you maintain your records and copies of reports for inspection for at least three (3) years. In addition, you may be required to respond to Commission requests for information regarding your committee's federal election activity and previously filed reports.

If your committee again becomes active in federal elections, it will be required to re-register with the Commission in accordance with the Federal Election Campaign Act and applicable Regulations. Your committee will be treated as a new entity by the Commission and should register as a new committee on FEC FORM 1, pursuant to 52 U.S.C. §§30102(g) and 30103(a).

If you have any questions concerning your status and requirements, please contact the Reports Analysis Division on the toll-free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). My local number is (202) 694-1148.

Sincerely,

Scott Bennett
Senior Campaign Finance Analyst

ELIZABETH COHEN

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10 G St NE
Suite 600
Washington DC
20002

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Debbie Chacona
Federal Election Commission
1050 First St, NE
Washington, DC 20463

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