



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 10, 2013

JOHN BOTTS
NARAL Pro-Choice America
1156 15TH STREET NW
WASHINGTON, DC 20005

Response Due Date
07/15/2013

IDENTIFICATION NUMBER: C90004185

REFERENCE: YEAR-END REPORT (10/01/2012 - 12/31/2012)

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 4 item(s):

1. It appears that 24-hour notice(s) for the attached independent expenditures was filed late. Please be advised that 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)) Please provide clarification regarding the timeliness of your 24-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))

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2. It appears that 48-hour notice(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 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 24-hour reports, filed on 10/27/12, disclosed independent expenditures that do not appear on Schedule 5-E of your quarterly filing (see attached). Please amend your report to include these expenditures or provide an explanation of this apparent discrepancy. (11 CFR § 109.10(b))

4. Your quarterly report discloses independent expenditures that do not appear on 24-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))

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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))

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 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.

If you should 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) 694-1395.

Sincerely,



Ben Holly
Senior Campaign Finance Analyst
Reports Analysis Division

Late Filed 24-Hour Notices**NARAL Pro-Choice America (C90004185)**

Name	Date	Amount	Purpose	Candidate
XO Communications	10/24/12	\$331.86	Telemarketing	Barack Obama
XO Communications	10/24/12	\$331.86	Telemarketing	Mitt Romney
XO Communications	10/25/12	\$105.18	Telemarketing	Barack Obama
XO Communications	10/25/12	\$105.18	Telemarketing	Mitt Romney
Crossroads Campaigns	10/25/12	\$6,661.90	Printing, postage, mailshop fees	Anthony Strickland

Late Filed 48-Hour Notices

NARAL Pro-Choice America (C90004185)

Name	Date	Amount	Purpose	Candidate
Envison Communications	10/15/12	\$12,373.78	Media production expense	Mitt Romney

**Filed 24-Hour Notices, not reported on Quarterly Report
NARAL Pro-Choice America (C90004185)**

Name	Date	Amount	Purpose	Candidate
Chapman Cubine Adams & Hussey	10/25/12	\$437.50	Copy, art & production	Todd Akin
Crossroads Campaigns	10/25/12	\$6,642.90	Printing, postage, mailshop fees	Anthony Strickland

Missing 24-Hour Notices**NARAL Pro-Choice America (C90004185)**

Name	Date	Amount	Purpose	Candidate
Chapman Cubine Adams & Hussey	10/24/12	\$218.75	Copy, art & production	Joe Walsh
Chapman Cubine Adams & Hussey	10/24/12	\$218.75	Copy, art & production	Richard Mourdock
NARAL Pro-Choice Foundation	10/24/12	\$1,686.31	List rental	Joe Walsh
NARAL Pro-Choice Foundation	10/24/12	\$1,686.31	List rental	Richard Mourdock