

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)

FEC IDENTIFICATION NUMBER

Jobs, Freedom, and Security PAC

C00536540

Mailing Address PO BOX 25376

City State ZIP Code
HOUSTON TX 77265

June 15, 2022
Ms. Maggie Hanna
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Dear Ms. Hanna,

The Jobs, Freedom, and Security PAC, FEC ID# C00536540, is in receipt of your Request for Additional Information.

Jobs, Freedom & Security PAC ("JFS") respectfully disagrees with the position that JFS needs to separately report transfers-in of net joint fundraising proceeds from Ted Cruz Victory Committee comprised of contributions that do not trigger the \$200 itemization threshold on a memo of Schedule A, and this has never previously been the FEC's position. 11 C.F.R. 102.17(c)(8)(i)(B) provides that "Each participating political committee [in a joint fundraising committee] shall also file a memo Schedule A ITEMIZING its share of gross receipts AS CONTRIBUTIONS FROM ORIGINAL CONTRIBUTORS TO

THE EXTENT REQUIRED UNDER 11 CFR 104.3(a)." (emphasis added)

The regulation does not require a memo Schedule A for gross receipts, but rather an itemization of "contributions from ORIGINAL CONTRIBUTORS" (emphasis added) to the extent that such contributions otherwise would have to be itemized if the

participating committee received the contribution directly (i.e., if the contribution triggers the \$200 itemization threshold under 11 C.F.R. 104.3(a), and specifically 104.3(a)(4)(i)). Nowhere in the referenced Section 104.3(a) does it require joint fundraising committee participants to separately "itemize" a lump sum transfer-in of net joint fundraising proceeds, as that would not be itemizing "contributions from original contributors."

Moreover, even if the "transfers" provision under 11 C.F.R. 104.3(a)(4)(iii) could be read to apply to the reporting requirement under 11 C.F.R. 102.17(c)(8)(i)(B) (and it should not, for the reason explained above), the transfers provision only specifically applies to: (a) transfers between authorized committees; (b) transfers from "each affiliated committee or organization" to an unauthorized committee; and (c) transfers between political party committees. None of those conditions applies here: JFS is neither an authorized committee nor a political party committee, and the Ted Cruz Victory Committee is neither an "affiliated committee or organization" of JFS nor a political party committee.

Sincerely,
Cabell Hobbs