

MISCELLANEOUS REPORT TO THE FEC (FEC Form 99)

NAME OF COMMITTEE (In Full)

FEC IDENTIFICATION NUMBER

THE 2026 VICTORY COMMITTEE

C00873828

Mailing Address 126 C STREET NORTHWEST
THIRD FLOOR

| | | |
|------------|-------|----------|
| City | State | ZIP Code |
| WASHINGTON | DC | 20001 |

AARON KELLEY
SENIOR CAMPAIGN FINANCE ANALYST
REPORTS ANALYSIS DIVISION
FEDERAL ELECTION COMMISSION
1050 FIRST STREET, NE
WASHINGTON, DC 20463

RE: THE 2026 VICTORY COMMITTEE (C00873828)
AMENDED APRIL QUARTERLY REPORT (01/01/2025?03/31/2025)
JULY QUARTERLY REPORT (04/01/2025?06/30/2025)

DEAR MR. KELLEY:

THIS LETTER RESPONDS TO THE COMMISSION’S REQUESTS FOR ADDITIONAL INFORMATION DATED DECEMBER 8, 2025, REGARDING CONTRIBUTIONS DISCLOSED ON SCHEDULE A THAT APPEAR TO EXCEED THE COMBINED APPLICABLE LIMITS OF THE JOINT FUNDRAISING COMMITTEE’S PARTICIPANTS PURSUANT TO 11 CFR ?102.17(C)(5).

BACKGROUND AND COMPLIANCE CONTEXT
DURING THE FIRST HALF OF THE 2025 REPORTING YEAR, THE 2026 VICTORY COMMITTEE UNDERWENT A SIGNIFICANT TRANSITION IN ITS FUNDRAISING AND COMPLIANCE INFRASTRUCTURE, INCLUDING A CHANGE IN SOFTWARE SYSTEMS IMPLEMENTED TO BETTER MANAGE A HIGH VOLUME OF TRANSACTIONS AND IMPROVE ALLOCATION AND REPORTING CONTROLS ACROSS JOINT FUNDRAISING PARTICIPANTS. DURING THIS TRANSITION PERIOD, THE COMMITTEE IDENTIFIED THAT CERTAIN CONTRIBUTIONS WERE RECEIVED THROUGH THE JOINT FUNDRAISING PROCESS IN AMOUNTS THAT, WHEN AGGREGATED, EXCEEDED THE COMBINED APPLICABLE LIMITS OF THE PARTICIPATING COMMITTEES AT THE TIME OF RECEIPT.

AT THE TIME THESE CONTRIBUTIONS WERE RECEIVED, THE JOINT FUNDRAISING COMMITTEE INCLUDED BOTH A PRINCIPAL CAMPAIGN COMMITTEE AND HYBRID POLITICAL COMMITTEES AS PARTICIPANTS. ALTHOUGH AMOUNTS IN EXCESS OF THE CANDIDATE COMMITTEE’S APPLICABLE LIMIT WERE ATTRIBUTED TO THE NON-CONTRIBUTION ACCOUNTS OF THE HYBRID PAC PARTICIPANTS, THE COMMITTEE RECOGNIZES THAT UNDER 11 CFR ?102.17(C)(5), PERMISSIBILITY IS ASSESSED AT THE TIME OF RECEIPT BASED ON THE COMBINED APPLICABLE LIMITS OF ALL PARTICIPANTS.

CORRECTIVE ACTION
UPON IDENTIFYING THIS ISSUE THROUGH INTERNAL COMPLIANCE REVIEW AND IN CONNECTION WITH THE COMMISSION’S CORRESPONDENCE, THE COMMITTEE INITIATED CORRECTIVE ACTION. ALTHOUGH THE 60-DAY PERIOD REFERENCED IN THE COMMISSION’S REGULATIONS HAS ELAPSED, THE COMMITTEE IS IN THE PROCESS OF REFUNDING THE EXCESSIVE PORTIONS OF THE CONTRIBUTIONS TO THE DONOR. THE COMMITTEE IS TAKING THIS ACTION PROMPTLY AND IN GOOD FAITH TO RESOLVE THE MATTER FULLY AND ENSURE COMPLIANCE WITH THE ACT.

AMENDED REPORTS WILL BE FILED, AS NECESSARY, TO REFLECT THE REFUNDS ACCURATELY ONCE THE

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CONCLUSION
THE COMMITTEE RESPECTFULLY SUBMITS THAT THE ISSUES IDENTIFIED IN THE REQUESTS FOR ADDITIONAL INFORMATION AROSE FROM AN INADVERTENT COMPLIANCE ISSUE DURING A SYSTEMS TRANSITION, WERE NOT INTENDED TO CIRCUMVENT THE CONTRIBUTION LIMITS OF THE ACT, AND ARE BEING ADDRESSED THROUGH CORRECTIVE REFUNDS AND REVISED COMPLIANCE CONTROLS. THE COMMITTEE REMAINS COMMITTED TO FULL COMPLIANCE WITH THE FEDERAL ELECTION CAMPAIGN ACT AND COMMISSION REGULATIONS.

PLEASE DO NOT HESITATE TO CONTACT ME IF ADDITIONAL INFORMATION WOULD BE HELPFUL IN RESOLVING THIS MATTER.

SINCERELY,
JASON D. BOLES
TREASURER