

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: May 25, 2017

ANALYST: Nicole Miller

I. COMMITTEE: National Right to Life Political Action
Committee
(C00111278)
Wayne Cockfield, Treasurer
512 10th Street, N.W.
Washington, DC 20004

II. RELEVANT STATUTE: 52 U.S.C § 30104(g)(1)
11 CFR §104.4(c)

III. BACKGROUND:

Failure to Provide a Supporting Schedule (Failure to Timely File a 24-Hour Report)

National Right to Life Political Action Committee ("the Committee") failed to timely file one (1) 24-Hour Report to support two (2) independent expenditures totaling \$30,000.00, disclosed on the 2016 30 Day Post-General Report made after the 20th day but more than 24 hours before the 2016 General Election (Attachment 2).

On December 16, 2016, the Committee filed the 2016 30 Day Post-General Report covering October 20, 2016 through November 28, 2016. The report included a Schedule E (Itemized Independent Expenditures) disclosing two-hundred ninety-five (295) independent expenditures totaling \$141,297.49, made in support of or in opposition to two-hundred sixty (260) federal candidates. The Committee failed to timely file a 24-Hour Report to disclose two (2) independent expenditures totaling \$30,000.00 for the 2016 General Election (Images 201612169040649484-85).

Subsequently, on December 16, 2016, the Committee filed one (1) 24-Hour Report to support two (2) independent expenditures, totaling \$30,000.00, disseminated on October 28, 2016 (Image 201612169040649678).

On February 9, 2017, a Request for Additional Information (RFAI) was sent to the Committee referencing the 2016 30 Day Post-General Report. The RFAI noted that the Committee may have failed to timely file one or more of the required 24-Hour Reports for the independent expenditures disclosed on the report. A chart was included with the RFAI identifying two (2) independent expenditures, totaling \$30,000.00, for which a 24-Hour Report had been filed late (Image 201702090300077373).

On April 6, 2017, after attempting to contact the Committee over the phone, the RAD Analyst e-mailed Wayne Cockfield, the Committee's Treasurer. The e-mail explained that the Analyst was trying to contact the Committee regarding an outstanding matter on the Committee's 2016 30 Day Post-General Report and requested a call back. (Attachment 3).

On April 26, 2017, the Analyst called Amarie Natividad, the Committee's Custodian of Records. The Analyst explained that the Committee had failed to respond to the RFAI referencing the 2016 30 Day Post-General Report sent on February 9, 2017. The Analyst explained that the Committee failed to timely file one or more of the required 24-Hour Reports for independent expenditures disclosed on the report and this matter would be referred for potential further action to the Commission. Ms. Natividad said that she would contact the PAC's political director and pass on the message.

Subsequently, the Analyst spoke with Karen Cross, the Committee's political director. The Analyst explained that the RFAI was sent to the Committee because the Committee failed to timely file one or more of the required 24-Hour Reports for independent expenditures disclosed on 2016 30 Day Post-General Report. The Analyst explained that the RFAI can be viewed on the FEC website and that the Committee would be referred for potential further action to the Commission. The Analyst stated that the Committee can file a Miscellaneous Electronic Submission ("FEC Form 99") to provide any additional information for public record.

To date, no further communications have been received from the Committee regarding this matter.

CONFIDENTIAL

O-Index (2017)

Cmte. ID: C0011278 Cmte. Name: NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE
 Treasurer Name: COCKFIELD, WAYNE Address: 512 10TH STREET, N.W., WASHINGTON, DC 20004
 Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: B (LOBBYIST/REGISTRANT PAC) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			4/28/2017	1	2017042889053485712										
FIA			4/28/2017	5	2017042889053485023										
Totals															

O-Index (2015-2016)

Cmte. ID: C0011278 Cmte. Name: NATIONAL RIGHT TO LIFE POLITICAL ACTION COMMITTEE
 Treasurer Name: COCKFIELD, WAYNE Address: 512 10TH STREET, N.W., WASHINGTON, DC 20004
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Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			5/13/2015	1	15951371548										
MS-T			6/2/2015	5	15031430940	10/16/2014	11/24/2014								
RQ2	30G	N	2/9/2017	3	201702090300077373	10/20/2016	11/28/2016	2/9/2017							
F3XN	MY	N	7/31/2015	33	201507319000510391	1/1/2015	6/30/2015		\$155,202	\$44,578	\$132,845	\$86,935	\$306	\$588,000	\$306
F3XN	YE	N	1/31/2016	50	201601319005237901	7/1/2015	12/31/2015		\$86,935	\$21,338	\$11,487	\$96,786	\$306	\$588,000	\$306
F3XN	Q1	N	4/14/2016	23	201604149012414839	1/1/2016	3/31/2016		\$86,788	\$66,978	\$4,050	\$159,716	\$306	\$588,000	\$306
F3XA	Q1	A	4/15/2016	24	201604159012469914	1/1/2016	3/31/2016		\$86,788	\$66,978	\$4,050	\$159,716	\$306	\$588,000	\$306
F3XN	Q2	N	7/15/2016	37	201607159020612845	4/1/2016	6/30/2016		\$159,716	\$158,605	\$9,831	\$308,489	\$306	\$588,000	\$306
F3XA	Q2	A	8/1/2016	40	201608019022164889	4/1/2016	6/30/2016		\$159,716	\$158,605	\$9,831	\$308,489	\$306	\$588,000	\$306
F3XN	Q3	N	10/15/2016	38	201610159032875847	7/1/2016	9/30/2016		\$308,489	\$59,026	\$33,604	\$333,711	\$306	\$588,000	\$306
F3XN	12G	N	10/26/2016	38	201610269034598984	10/1/2016	10/19/2016		\$333,711	\$93,249	\$260,342	\$166,618	\$306	\$588,000	\$306
F3XN	30G	N	12/16/2016	192	201612169040849309	10/20/2016	11/28/2016		\$166,618	\$116,130	\$239,348	\$43,399	\$306	\$628,000	\$306
F3XN	YE	N	1/31/2017	24	201701319042138583	11/29/2016	12/31/2016		\$43,399	\$16,172	\$2,740	\$56,831	\$306	\$628,000	\$306
Totals															

